

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MARCUS MIAL,)	
)	
Plaintiff,)	
)	
v.)	1:11-cv-921
)	
JENNIFER A. SHERIN, <i>et al.</i> ,)	
)	
Defendants.)	

**PLAINTIFF'S MEMORANDUM AND POINTS OF AUTHORITY IN SUPPORT
OF PLAINTIFF'S MOTION FOR ATTORNEY'S FEES AND COSTS**

COMES NOW, the Plaintiff, Marcus Mial, by counsel, and hereby files this Memorandum and Points of Authority in Support of Plaintiff's Motion For Attorney's Fees and Costs and, in support thereof, states the following:

Facts of the Case

Plaintiff brought this action against Defendants for unreasonable entry into his home and for excessive force, pursuant to 42 U.S.C. § 1983. He sought advice from Baker Simmons but retained Victor Glasberg & Associates. Later he retained the services of Steven David Stone, P.C. who then withdrew and was replaced by Westlake Legal Group. During the pendency of the case in the Eastern District of Virginia, Plaintiff also was required to retain the services of the Law Offices of Peter T. Enslein while Defendants appealed part of the matter.

On March 30, 2015, the jury returned a verdict for Plaintiff and awarded him \$225,000.00 in economic damages and \$25,000.00 in punitive damages against Defendant Sherin for unreasonable entry; \$225,000.00 in economic damages and

\$25,000.00 in punitive damages against Defendant Ferguson for unreasonable entry; and \$146,000.00 in economic damages and \$16,500.00 in punitive damages against Defendant Sayre for excessive force. Judgment was entered March 31, 2015 reflecting the same. Judgment attached hereto as Exhibit A.

Plaintiff Is Entitled to Attorney's Fees and Costs

Fed. R. Civ. Pro. 54 directs that costs should be allowed to the prevailing party and that, in addition to costs, a party may move for an award of attorney's fees as permitted by law.

Plaintiff is the prevailing party as judgment was entered in his favor against Defendants Sherin, Ferguson, and Sayre. Thus, as directly by the language of Rule 54, Plaintiff is entitled to an award of his costs.

Attorney's fees are authorized by 42 U.S.C. § 1988 which states that "the court, in its discretion, may allow the prevailing party . . . a reasonable attorney's fee as part of the costs . . ."

Again, as Plaintiff is the prevailing party, he requests an award of attorney's fees in addition to his costs.

Plaintiff's Costs To Which He Is Entitled Per Fed. R. Civ. Pro. 54

As Plaintiff is the prevailing party, he is entitled to an award of his costs per Fed. R. Civ. Pro. 54. Plaintiff's costs include the following:

Copies		\$1,039.50
Victor M. Glasberg & Associates	2/28/2011	\$2.80
Victor M. Glasberg & Associates	3/31/2011	\$5.60
Victor M. Glasberg & Associates	4/30/2011	\$0.80
Victor M. Glasberg & Associates	6/30/2011	\$14.60
Victor M. Glasberg & Associates	7/31/2011	\$22.00
Victor M. Glasberg & Associates	8/31/2011	\$25.40
Victor M. Glasberg & Associates	10/31/2011	\$28.00

Victor M. Glasberg & Associates	12/30/2011	\$0.20
Steven David Stone, P.C.	1/3/2012	\$25.20
Steven David Stone, P.C.	1/31/2012	\$152.40
Steven David Stone, P.C.	3/6/2012	\$163.20
Steven David Stone, P.C.	3/31/2012	\$169.30
Steven David Stone, P.C.	4/30/2012	\$339.80
Steven David Stone, P.C.	5/31/2012	\$90.20
Court Reporter		\$2,447.70
Victor M. Glasberg & Associates	12/15/2011	\$1,124.55
Victor M. Glasberg & Associates	12/15/2011	\$1,323.15
Expert Fees		\$12,594.50
Steven David Stone, P.C.	4/30/2012	\$1,400.00
Steven David Stone, P.C.	4/30/2012	\$1,044.50
Steven David Stone, P.C.	3/31/2012	\$4,000.00
Steven David Stone, P.C.	3/31/2012	\$3,000.00
Edwin N. Carter, Ph.D.	02/07/2012	\$3150.00
Filing Fee		\$350.00
Victor M. Glasberg & Associates	8/31/2011	\$350.00
Medical Records		\$100.03
Victor M. Glasberg & Associates	8/30/2011	\$54.44
Victor M. Glasberg & Associates	8/30/2011	\$20.90
Victor M. Glasberg & Associates	8/31/2011	\$24.69
PACER		\$23.20
Steven David Stone, P.C.	4/30/2012	\$23.20
Postage		\$213.36
Victor M. Glasberg & Associates	3/1/2011	\$1.39
Victor M. Glasberg & Associates	5/1/2011	\$1.22
Victor M. Glasberg & Associates	6/1/2011	\$1.56
Victor M. Glasberg & Associates	10/11/2011	\$38.90
Victor M. Glasberg & Associates	10/31/2011	\$2.27
Victor M. Glasberg & Associates	11/30/2011	\$1.05
Victor M. Glasberg & Associates	12/15/2011	\$17.98
Steven David Stone, P.C.	1/31/2012	\$8.94
Steven David Stone, P.C.	3/6/2012	\$32.00

Steven David Stone, P.C.	3/6/2012	\$15.20
Steven David Stone, P.C.	3/6/2012	\$10.35
Steven David Stone, P.C.	3/31/2012	\$42.50
Steven David Stone, P.C.	4/30/2012	\$11.14
Westlake Legal Group	2/19/2015	\$28.86
Process Service		\$337.00
Steven David Stone, P.C.	3/6/2012	\$164.00
Steven David Stone, P.C.	3/6/2012	\$80.00
Steven David Stone, P.C.	4/30/2012	\$93.00
Research		\$30,202.40
Victor M. Glasberg & Associates	10/27/2011	\$10.00
Victor M. Glasberg & Associates	11/18/2011	\$25.00
Steven David Stone, P.C.	1/31/2012	\$155.40
Steven David Stone, P.C.	3/6/2012	\$12.00
Steven David Stone, P.C.	4/30/2012	\$25,000.00
Steven David Stone, P.C.	3/31/2012	\$5,000.00
Service Charges		\$1.68
Westlake Legal Group	10/30/2014	0.61
Westlake Legal Group	11/30/2014	0.62
Westlake Legal Group	3/31/2015	0.45
Travel		\$740.76
Victor M. Glasberg & Associates	11/17/2011	\$31.95
Victor M. Glasberg & Associates	11/30/2011	\$2.50
Steven David Stone, P.C.	1/31/2012	\$53.40
Steven David Stone, P.C.	3/6/2012	\$21.09
Steven David Stone, P.C.	3/31/2012	\$88.50
Steven David Stone, P.C.	4/30/2012	\$10.00
Steven David Stone, P.C.	5/31/2012	\$17.76
Westlake Legal Group	5/7/2014	\$3.00
Westlake Legal Group	5/7/2014	\$34.43
Westlake Legal Group	9/18/2014	\$6.00
Westlake Legal Group	9/18/2014	\$34.43
Westlake Legal Group	2/18/2014	\$9.00
Westlake Legal Group	2/18/2014	\$34.43
Westlake Legal Group	3/17/2015	\$34.43
Westlake Legal Group	3/20/2015	\$17.50
Westlake Legal Group	3/20/2015	\$34.43
Westlake Legal Group	3/25/2015	\$7.00

Westlake Legal Group	3/25/2015	\$34.43
Westlake Legal Group	3/27/2015	\$35.58
Westlake Legal Group	3/30/2015	\$40.00
Westlake Legal Group	3/30/2015	\$10.00
Westlake Legal Group	3/30/2015	\$8.75
Westlake Legal Group	3/30/2015	\$137.72
Westlake Legal Group	3/30/2015	\$34.43
Witness Fees		\$637.81
Kirkland, Golden and Carolyn	03/23-25/15	\$637.81
Total Costs		\$48,687.94

Victor M. Glasberg & Associates statements reflecting costs are attached hereto as Exhibit B. Steven David Stone, P.C. statements reflecting costs are attached hereto as Exhibit C. Westlake Legal Group statements reflecting costs are attached hereto as Exhibit D. Edwin N. Carter, Ph. D. statement attached hereto as Exhibit E. Kirkland expense statement attached hereto as Exhibit F.

As provided by the Federal Rules of Civil Procedure, Plaintiff seeks an award of \$48,687.94 for costs incurred.

Plaintiff's Attorney's Fees are Reasonable and Should be Awarded

42 U.S. Code § 1988 authorizes “the court, in its discretion, [to] allow the prevailing party . . . a reasonable attorney’s fee as par of the costs . . .” for an action pursuant to 42 U.S. Code § 1983.

In determining what are reasonable attorney’s fees, the Court must consider twelve factors: “(1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of employment by the attorney due to the acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the

circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the ‘undesirability’ of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases.” Perdue v. Kenny, 559 U.S. 542, 550-551 (2010).

In the case at bar, Mr. Mial has incurred the following attorney’s fees:

Firm/Attorney	Rate	Hours	Total
Baker Simmons			\$700.00
Baker Simmons	Flat		\$400.00
Baker Simmons	\$300.00	1	\$300.00
Victor M. Glasberg & Associates		176.25	\$42,174.50
Armand, Bernadette	\$0.00	13.7	\$0.00
Armand, Bernadette	\$125.00	0.5	\$62.50
Armand, Bernadette	\$250.00	21.2	\$5,300.00
Glasberg, Victor (Attorney)	\$0.00	3.5	\$0.00
Glasberg, Victor (Attorney)	\$60.00	4	\$240.00
Glasberg, Victor (Attorney)	\$400.00	45.5	\$18,200.00
Glasberg, Victor (Attorney)	\$485.00	35.2	\$17,072.00
Jefferson, Antoinette	\$0.00	34.65	\$0.00
Jefferson, Antoinette	\$100.00	2	\$200.00
Tyler, Carissa (Law Clerk)	\$0.00	5	\$0.00
Tyler, Carissa (Law Clerk)	\$100.00	11	\$1,100.00
Steven David Stone, P.C.		864.08	\$269,647.25
Jackson, J.	\$125.00	94.25	\$11,781.25
Legal Assistant	\$85.00	35.75	\$3,038.75
Legal Assistant	\$100.00	19	\$1,900.00
Rivas, D.	\$125.00	1.25	\$156.25
Stone, Steven	\$500.00	424.33	\$212,165.00
Winoy, L.B.	\$0.00	29	\$0.00
Winoy, L.B.	\$125.00	56	\$181.00
Young, Luke	\$0.00	69.75	\$0.00
Young, Luke	\$300.00	134.75	\$40,425.00
Peter T. Enslein, P.C.			\$15,000.00
Payment Submitted 08/31/2012			\$15,000.00

Westlake Legal Group		359.75	\$114,186.25
Carrithers, Lavanya	\$250.00	2	\$500.00
Plofchan, Thomas	\$500.00	103.75	\$51,875.00
Hughes, Whitney Lawrimore	\$265.00	196.25	\$52,006.25
Hyde, Brittany	\$85.00	18.5	\$1,572.50
Logan, Melinda	\$140.00	21.25	\$2,975.00
Mercer, Victoria	\$140.00	3	\$420.00
Griffith, J. Daniel	\$325.00	14.25	\$4,631.25
Guida, Jennifer	\$275.00	0.75	\$206.25
TOTAL			\$441,708.00

In light of the attorney's fees incurred, Mr. Mial seeks an award of \$441,708.00 equal to the amount expended, to include representation by Baker Simmons (See Exhibit G), Victor M. Glasberg & Associates (See Exhibit B), Steven David Stone, P.C. (See Exhibit C) Peter T. Enslein, P.C. (See Exhibit H) and the value of work performed by Westlake Legal Group (See Exhibit I).

Time and Labor Expended Was Reasonable and Necessary

Plaintiff's claim is a complicated matter against four defendants. In preparing the case, twelve depositions were conducted, discovery requests were served on Plaintiff and Plaintiff served discovery requests on each defendant, the trial ultimately consisted of five days plus one day for jury deliberations. Additionally, Defendants filed a Motion for Summary Judgment which was denied, and subsequently Defendants appealed the ruling to the Fourth Circuit Court of Appeals, where the ruling was upheld. Further, Plaintiff sought to attend a settlement conference, of which Defendants declined to participate. These factors demonstrate that significant time was required to pursue this matter and the amount of time spent was not only reasonable, but was necessary.

The Matter is Novel and Difficult Requiring Significant Time and Experience

Allegations for relief under 42 U.S. Code § 1983 are complex by nature because of the various issues presented and the possible defenses available. In order to prevail, Plaintiff successfully demonstrated that the Defendants were not protected by qualified immunity, the Defendants knew or should have known Plaintiff's Constitutional protections, they disregarded those protections, they did not have justification for doing so, and that Plaintiff was injured as a result. Each element is complicated and requires detailed analysis of the facts and testimony of the witnesses. This is evidenced by the time spent preparing for trial, the duration of the trial, and the length of jury deliberations.

Plaintiff's Counsel was Precluded from Other Employment and the Time Limitation Imposed

The total time expended on Mr. Mial's case exceeds one thousand hours, which is equal to twenty-five weeks. The amount of time spent on the case would clearly hinder counsel's ability to represent other potential clients due to the amount of time and effort required in Mr. Mial's matter. Further, significant work was required as discussed above. Discovery was performed, numerous depositions were conducted, and the case was stayed in the District Court pending the appeal of the motion for summary judgment.

The Fees Incurred are Customary for Hourly Cases and Are Reasonable Assessments for Contingency Cases

The Law firms of Victor M. Glasberg & Associates and Steven David Stone, P.C. were retained on an hourly basis. Baker Simmons was retained in part on flat fee basis and in part hourly. Westlake Legal Group was retained on a contingency basis, but documentation is provided herein reflecting the work performed at an hourly rate.

Victor Glasberg opened his law firm in 1982 focusing on plaintiffs' civil rights. He has successfully litigated and settled cases addressing issues of free speech, religious liberties, prisoners' rights, police abuse, denial of due process, discrimination in the workplace and house, and other issues involving civil rights.

Steven David Stone graduated from law school in 1977 and represents clients in various types of complex litigation.

Thomas K. Plofchan, Jr. has submitted an affidavit regarding Westlake Legal Group's fees. See affidavit attached hereto as Exhibit J.

Each firm charges between \$400.00 to \$500.00 per hour for senior attorneys, \$250.00 to \$325.00 per hour for associate attorneys, and \$60.00 to \$140.00 per hour for support staff. The fact that four firms charge relatively similar rates, demonstrates that the rates are reasonable.

These rates also fall within the rates deemed reasonable in Taylor v. Republic Services, Inc., No. 1:2-cv-00523, Vienna Metro v. Pulte Home Corp., No. 1:10-cv-00502, and Tech Systems, Inc. v. Pyles, No. 1:12-cv-00374.

Furthermore, Mr. Mial has provided affidavits of local attorneys asserting that these rates are within the prevailing market rates in the Northern Virginia area for similar cases. See Exhibits K and L.

The Amount Involved, Results Obtained, and Similar Cases Justify the Amount Sought, Experience and Ability of the Attorneys

It is reasonable to award attorney's fees in excess of the judgment award. In Rivera, the Supreme Court affirmed an attorney's fee award of \$245,456.00 for a judgment of \$33,350.00. City of Riverside v. Rivera, 477 U.S. 561, 574 (1986). In a similar 42 U.S. Code § 1988 case, a jury awarded the Plaintiff \$2,943.60 and the Fourth

Circuit Court of Appeals affirmed an award of \$100,000.00 for attorney's fees, plus costs. McAfee v. Boczar, 738 F.3d 81 (2013).

As explained herein, the attorneys' experience is commensurate with their hourly rates. Moreover, Mr. Mial was awarded \$662,500.00, a significantly successful award. Thus, his attorney's fees should be deemed reasonable as they are even less than the jury award.

The Case Was Undesirable and Protracted

This case was clearly undesirable to the legal community as Mr. Mial worked with three separate law firms prior to retaining Westlake Legal Group. As he had such difficulty in obtaining counsel, it is evident the case was undesirable in the legal community. Moreover, the underlying events took place in 2010, the original complaint was filed in 2011, and the trial did not begin until 2015. The delay in having the matter resolved is due in part to Defendant's appeal of the motion for summary judgment. In light of this, Mr. Mial incurred legal fees in excess of what he would have incurred had the matter been resolved in a timely matter without the Defendants' appealing.

The Court should award Plaintiff \$48,687.94 in costs and should find that his attorney's fees incurred, totaling \$441,708.00 are reasonable and should be awarded to him.

Respectfully submitted,

/s/ Thomas K. Plofchan, Jr.
Thomas K. Plofchan, Jr. VSB 34536
Whitney Lawrimore Hughes VSB 82331
Counsel for Plaintiff
Westlake Legal Group
46175 Westlake Drive, Suite 320
Potomac Falls, Virginia 20165
Telephone 703-406-7616
Facsimile 703-434-3510
tplofchan@westlakelegal.com
wlawrimore@westlakelegal.com

CERTIFICATE OF SERVICE

I hereby certify that on this **10th day of April, 2015**, I will electronically file the foregoing PLAINTIFF'S MEMORANDUM AND POINTS OF AUTHORITY IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEY'S FEES AND COSTS with the Clerk of this Court using the CM/ECF system, which will then send a notification of such filing to any filing user.

/s/ Thomas K. Plofchan, Jr.
Thomas K. Plofchan, Jr. VSB 34536
Whitney Lawrimore Hughes VSB 82331
Counsel for Plaintiff
Westlake Legal Group
46175 Westlake Drive, Suite 320
Potomac Falls, Virginia 20165
Telephone 703-406-7616
Facsimile 703-434-3510
tplofchan@westlakelegal.com
wlawrimore@westlakelegal.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MARCUS MIAL,

Plaintiff,

v.

JENNIFER SHERIN, BRIAN SAYRE,
NATHAN FERGUSON, NICHOLAS J.
ALTOM,

Defendants.

Case No. 1:11-cv-00921-GBL-IDD

JUDGMENT IN A CIVIL ACTION

In accordance with the jury's verdict dated March 30, 2015 and Federal Rule of Civil Procedure 58, judgment is hereby entered as follows:

1. Judgment is entered in favor of Plaintiff MARCUS MIAL and against Defendant JENNIFER A. SHERIN on the claim for unreasonable search and seizure by warrantless entry in the amount of TWO HUNDRED AND TWENTY-FIVE THOUSAND DOLLARS AND 00/CENTS (\$225,000.00) in economic damages, and TWENTY-FIVE THOUSAND DOLLARS AND 00/CENTS (\$25,000.00) in punitive damages, for a total of TWO HUNDRED AND FIFTY THOUSAND DOLLARS AND 00/CENTS (\$250,000.00);

2. Judgment is entered in favor of Defendant JENNIFER A. SHERIN and against Plaintiff MARCUS MIAL on the claim for excessive force. Plaintiff MARCUS MIAL shall recover no damages on this claim;

3. Judgment is entered in favor of Plaintiff MARCUS MIAL and against Defendant NATHAN FERGUSON on the claim for unreasonable search and seizure by warrantless entry in the amount of TWO HUNDRED AND TWENTY-FIVE THOUSAND DOLLARS AND



00/CENTS (\$225,000.00) in economic damages, and TWENTY-FIVE THOUSAND DOLLARS AND 00/CENTS (\$25,000.00) in punitive damages, for a total of TWO HUNDRED AND FIFTY THOUSAND DOLLARS AND 00/CENTS (\$250,000.00);

4. Judgment is entered in favor of Defendant NATHAN FERGUSON and against Plaintiff MARCUS MIAL on the claim for excessive force. Plaintiff MARCUS MIAL shall recover no damages on this claim;

5. Judgment is entered in favor of Plaintiff MARCUS MIAL and against Defendant BRYAN SAYRE on the claim of excessive force in the amount of ONE HUNDRED AND FORTY-SIX THOUSAND DOLLARS AND 00/CENTS (\$146,000.00) in economic damages, and SIXTEEN THOUSAND FIVE HUNDRED DOLLARS AND 00/CENTS (\$16,500.00) in punitive damages, for a total of ONE HUNDRED AND SIXTY-TWO THOUSAND FIVE HUNDRED DOLLARS AND 00/CENTS (\$162,500.00).

4. Judgment is entered in favor of DEFENDANT NICHOLAS J. ALTOM and against Plaintiff MARCUS MIAL on the claim for excessive force. Plaintiff MARCUS MIAL shall recover no damages on this claim.

Date: March 31, 2015

For: CLERK OF COURT

By Deputy Clerk:

Terese Bull

Digitally signed by Terese Bull
DN: cn=Terese Bull, o=U.S. District Court, ou,
email=terese_bull@vaed.uscourts.gov, c=US
Date: 2015.03.31 17:05:21 -04'00'

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

March 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

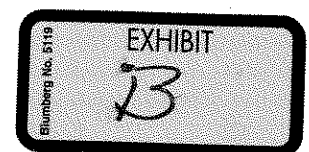
S T A T E M E N T

Professional Services

		<u>Hours</u>	<u>Amount</u>
2/10/2011	CT-1 Research exigent circumstances	3.00	300.00
2/17/2011	CT-1 Research exigent circumstances	2.00	200.00
2/18/2011	CT-1 Research exigent circumstances	3.00	N/C
2/24/2011	CT-1 Research exigent circumstances	2.00	N/C
Total fees		10.00	\$600.00

Costs:

2/28/2011	February copies	2.80
Total current costs		\$2.80
3/1/2011	Payment from escrow	(\$502.80)
Total payments and adjustments		(\$502.80)
Total new charges since last bill		\$502.80



Marcus Mial

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Amount

Total due:

\$0.00Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Carissa Tyler-LawClerk	5.00	100.00	\$500.00
Carissa Tyler-LawClerk	5.00	0.00	\$0.00

Previous escrow balance	\$0.00
2/4/2011 Payment to escrow	\$4,000.00
3/1/2011 Payment from escrow	(\$502.80)
New escrow balance	<u>\$3,497.20</u>

I.R.S. Identification No. 54-1217562

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

April 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Professional Services

		<u>Hours</u>	<u>Amount</u>
3/1/2011 CT-1	Legal research & memo	4.00	400.00
V485	Draft letter to Sheriff -- revise	0.20	97.00
3/17/2011 CT-1	Legal research & memo	2.00	200.00
3/21/2011 V485	Read Carissa's memo & same case; letter to client	1.20	582.00
3/23/2011 V485	Review legal memo; revise letter	1.20	582.00
Total fees		8.60	\$1,861.00
<u>Costs:</u>			
3/31/2011	March copies		5.60
	March postage		1.39
Total current costs			56.99
4/1/2011	Payment from escrow		(\$1,867.99)
Total payments and adjustments			(\$1,867.99)

Marcus Mial

Page 2

Amount

Total new charges since last bill

\$1,867.99

Total due:

\$0.00Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Carissa Tyler-LawClerk	6.00	100.00	\$600.00
V485	2.60	485.00	\$1,261.00

Previous escrow balance

\$3,497.20

4/1/2011 Payment from escrow

(\$1,867.99)

New escrow balance

\$1,629.21

I.R.S. Identification No. 54-1217562

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

June 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Professional Services

	<u>Hours</u>	<u>Amount</u>
5/24/2011 V485 Read transcripts	2.00	970.00
V485 Read transcripts & criminal file	2.10	1,018.50
5/31/2011 V485 Draft complaint	3.10	1,503.50
Total fees	7.20	\$3,492.00
<u>Costs:</u>		
4/30/2011 April copies		0.80
5/31/2011 May postage		1.22
Total current costs		\$2.02
6/1/2011 Payment from escrow		(\$3,494.02)
Total payments and adjustments		(\$3,494.02)
Total new charges since last bill		\$3,494.02

Marcus Mial

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Amount

Total due:

\$0.00

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
V485	7.20	485.00	\$3,492.00

Previous escrow balance	\$1,629.21
5/25/2011 Payment to escrow	\$10,000.00
6/1/2011 Payment from escrow	(\$3,494.02)
New escrow balance	<u>\$8,135.19</u>

I.R.S. Identification No. 54-1217562

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

July 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Professional Services

	<u>Hours</u>	<u>Amount</u>
6/16/2011 V485 Review county policy docs.; letter to client; letter to Melissa Spring	1.20	\$82.00
6/29/2011 V485 Revise complaint; letter to client	0.50	242.50
	<hr/>	<hr/>
Total fees	1.70	\$824.50
 <u>Costs:</u>		
6/30/2011 June postage		1.56
June copies		14.60
	<hr/>	<hr/>
Total current costs		\$16.16
7/1/2011 Payment from escrow		(1610.66)
	<hr/>	<hr/>
Total payments and adjustments		(1640.66)
	<hr/>	<hr/>
Total new charges since last bill		\$0.00
	<hr/>	<hr/>
Total due:		\$0.00

Marcus Mial

Page 2

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
V485	1.70	485.00	\$824.50

Amount

Previous escrow balance	58,135.19
7/1/2011 Payment from escrow	(5040.66)
New escrow balance	<u>52,994.53</u>

I.R.S. Identification No. 54-1217562

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

August 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Professional Services

		<u>Hours</u>	<u>Amount</u>
7/7/2011 V485	Edit complaint as per client input; email to client re details	1.70	824.50
7/8/2011 V485	Telecon., client; revise complaint	1.20	582.00
Total fees		2.90	\$1,406.50

Costs:

7/31/2011 July copies	\$2.00
Total current costs	\$2.00
8/1/2011 Payment from escrow	(\$1,000.00)
8/1/2011 Adjust fees	(\$428.50)
Total payments and adjustments	(\$1,428.50)
Total new charges since last bill	\$1,428.50
Total due:	\$0.00

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

September 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Costs:

Amount

8/30/2011 HealthPort (Internal Med. Assn of Reston med. records) 54.44

HealthPort (Inova Fairfax Hosp. med. records) 20.00

8/31/2011 Clerk, U.S. District Court (filing fee) 50.00

Virginia Heart (med. records) 5.00

August copies 25.00

Total current costs 154.44

9/1/2011 Payment from escrow (\$475.43)

Total payments and adjustments 320.99

Total due: 17.45

Previous escrow balance 30,291.57

9/1/2011 Payment from escrow (\$475.43)

Marcus Mial

Page 2

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
V485	2.90	485.00	\$1,406.50

Amount

Previous escrow balance	\$7,294.50
8/1/2011 Payment from escrow	(\$1,000.00)
New escrow balance	<u>\$6,294.50</u>

I.R.S. Identification No. 54-1217562

Marcus Mial

Page 2

Amount

New escrow balance

51,400.00

I.R.S. Identification No. 54-1217562

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

October 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Professional Services

		<u>Hours</u>	<u>Amount</u>
9/14/2011 V485	Research qualified immunity issues	1.00	485.00
9/21/2011 V485	Disclosures; email to client; start discovery	1.00	485.00
9/22/2011 V485	Telecon., client; disclosures; start interrogatories	1.30	630.50
9/27/2011 AnJe	Research & review case law, info. & articles on unpublished judicial opinions	4.50	N/C
9/29/2011 V485	Interrogatories; revise admissions	1.30	630.50
9/30/2011 V485	Review answers & correlate w/complaint; revise & serve interrogatories & admissions	5.10	2,473.50
Total fees		14.20	34,104.50

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

November 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Professional Services

		<u>Hours</u>	<u>Amount</u>
10/3/2011	AnJe Read & research case law on qualified immunity	3.00	N/C
10/4/2011	AnJe Read & research case law on qualified immunity	3.00	N/C
10/5/2011	V485 Telecon., Francuzenko re planning; letter to client	0.50	242.50
10/6/2011	V485 Telecon., Francuzenko re schedule; emails to client	0.30	145.50
10/7/2011	V485 Emails to client	0.10	48.50
10/11/2011	V485 Client depo. prep.; review docs.	3.00	1,455.00
	AnJe Client meeting -- trial preparation	3.00	N/C
10/13/2011	V485 Review depo. prep. video & send to client; review client damage itemization; letter to client re mental health issues	0.50	242.50

Marcus Mial

Page 2

	<u>Hours</u>	<u>Amount</u>
10/17/2011 V485 Read objections; discovery letter to Francuzenko	1.40	679.00
10/18/2011 AnJe Research -- qualified immunity	1.00	N/C
10/19/2011 V485 Telecon., Alex re discovery; letter to Alex confirming amend disclosures re docs.	1.60	776.00
10/20/2011 V485 Review Durkin notes; telecon., Durkin; letter to client re Durkin	1.20	582.00
10/23/2011 BFA- Emails, VMG; research St. John v. Napolitano	0.50	125.00
10/24/2011 V485 Telecon., client -- OK to drop mental health injury; amend complaint; email to Francuzenko re amendment	1.00	485.00
AnJe Research -- qualified immunity	1.00	100.00
10/31/2011 V485 Review incoming discovery; letter to client re discovery; 2nd interrogatories to Simpson	1.50	727.50
AnJe Research qualified immunity	1.00	100.00
Total fees	23.60	\$5,708.50
<u>Costs:</u>		
10/11/2011 Federal Express		36.90
10/27/2011 Westlaw (on-line research)		10.00
10/31/2011 October copies		28.00
October postage		2.27

Page 3

Marcus Mial

	<u>Amount</u>
Total current costs	\$79.17
11/1/2011 Payment from escrow	(\$5,787.67)
Total payments and adjustments	(\$5,787.67)
Total new charges since last bill	\$5,787.67
Total due:	<u>\$0.00</u>

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Antonette Jefferson	2.00	100.00	\$200.00
Antonette Jefferson	10.00	0.00	\$0.00
Bernadette Armand	0.50	250.00	\$125.00
V485	11.10	485.00	\$5,383.50

Previous escrow balance	\$6,819.10
11/1/2011 Payment from escrow	(\$5,787.67)
New escrow balance	<u>\$1,031.43</u>

I.R.S. Identification No. 54-1217562

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

December 01, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Professional Services

		<u>Hours</u>	<u>Amount</u>
11/1/2011	V400 Read admissions; annotate discovery; multiple emails to Francuzenko re discovery; emails, client re discovery & docs.; amend disclosures	2.40	960.00
	VS Index motion hearing transcript	4.00	240.00
	AnJe Review article re unpublished opinions; begin cite check for unpublished opinion precedent	5.00	N/C
11/2/2011	V400 Emails Francuzenko & client re depos.; multiple emails, Francuzenko re various discovery issues; review med. data for disclosures; emails, client re med. data; start depo.	3.40	1,360.00
11/5/2011	BFA- Travel to from client home -- depo. preparation & investigation; review reports	6.00	2,000.00
	V400 To/from Ashburn - lunch (n/c)	6.50	2,600.00

Marcus Mial			Page	2
			<u>Hours</u>	<u>Amount</u>
11/7/2011	V400	Telecon., client re # deputies; email to client re misc. discovery issues	0.20	80.00
	AnJe	Continue shephardizing cases	3.15	N/C
11/9/2011	BFA-	Deposition preparation (Sayre)	4.00	1,000.00
	V400	Prepare Sherin depo.; read & reply to emails re client objections to discovery; prepare depositions; disclosures	5.50	2,200.00
11/10/2011	BFA-	Sherin deposition	8.00	N/C
	V400	Prepare Sherin depo.; Sherin depo., prepare Ferguson depo.	10.00	4,000.00
11/11/2011	BFA-	Ferguson deposition; case debrief session	5.00	N/C
	V400	Prepare Ferguson depo.; Ferguson depo.; conf., client; letter to client (n/c)	6.00	2,400.00
11/14/2011	BFA-	Review emails re case strategy, Sayre depo.	0.10	N/C
	AnJe	Citing references for case law	5.00	N/C
11/15/2011	BFA-	Sayre depo. preparation; Sayre depo.	5.00	1,250.00
	V400	Sayre depo. (n/c); conf., client	1.50	600.00
	AnJe	Write up for citing references & shephardized cases	5.00	N/C
11/16/2011	BFA-	Conf., client & wife; research Sherin background; review emails re discovery	2.00	500.00

Marcus Mial

Page 3

		<u>Hours</u>	<u>Amount</u>
11/16/2011	V400 Telecon., Sanders; review Sherin data; conf., client & Theresa; email to Francuzenko re amendment; amended complaint	3.00	1,200.00
11/17/2011	V400 Emails to/from client re amendment; further revisions, amendment	0.50	200.00
11/18/2011	V400 Start review new client docs via email; telecon., Francuzenko	0.20	80.00
11/20/2011	V400 Final revisions, amended complaint; email to client re same	0.30	120.00
11/21/2011	V400 Email & telecons., client; letter to client	0.30	120.00
	AnJe Write up for shephardized cases	5.00	N/C
11/23/2011	BFA- Telecon., client re failure to respond; telecon., re withdrawal from case; emails re same	0.60	N/C
	V400 Conf., Bernadette; telecon., client; draft withdrawal; telecon., Francuzenko; letter to judge	1.00	N/C
11/29/2011	V400 Conf., Steve Stone	2.50	N/C
Total fees		103.15	\$20,910.00

Costs:

11/17/2011	Tolls & mileage -- 11/5 client meeting	31.95
11/18/2011	Westlaw (on-line research)	25.00
11/30/2011	Parking (11/18, 11/23 -- to court)	2.50
November copies		252.40

Marcus Mial

Page 4

Amount

11/30/2011 November postage 1.05

Estimated court reporter costs 2,250.00

Total current costs \$2,562.90

11/29/2011 Payment from escrow (\$8,031.43)

12/1/2011 Credit (\$85/hour) for 32.60 hours billed @ (\$2,771.00)
\$485/hour (June 1 - November 1)

Total payments and adjustments (\$10,802.43)

Total new charges since last bill \$23,472.90

Total due: \$12,670.47

Attorney Summary

Name	Hours	Rate	Amount
Antonette Jefferson	23.15	0.00	\$0.00
Bernadette Armand	19.00	250.00	\$4,750.00
Bernadette Armand	13.70	0.00	\$0.00
V400	39.80	400.00	\$15,920.00
V400	3.50	0.00	\$0.00
VS (paralegal)	4.00	60.00	\$240.00

Previous escrow balance \$1,031.43

11/15/2011 Payment to escrow \$7,000.00

11/29/2011 Payment from escrow (\$8,031.43)

New escrow balance \$0.00

I.R.S. Identification No. 54-1217562

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

December 15, 2011

Marcus Mial
 20010 Palmer Classic Parkway
 Ashburn, VA 20147

S T A T E M E N T

Costs:

Amount

12/15/2011 MAR Reporting (Sherin depo.)	1,323.15
MAR Reporting (Ferguson, Sayre depos.)	1,124.55
Federal Express (11/21 delivery to client)	17.98
 Total current costs	 \$2,465.68
Previous balance	\$12,670.47
12/9/2011 Payment - Thank You	(\$12,670.47)
12/9/2011 Credit for prepaid court reporter fees -- posted against actual reporter costs	(\$2,250.00)
 Total payments and adjustments	 (\$14,920.47)
 Total due:	 \$215.68

I.R.S. Identification No. 54-1217562

Victor M. Glasberg & Associates
 121 S. Columbus Street
 Alexandria, VA 22314

January 01, 2012

Steven David Stone, Esq.
 Steven David Stone, P.C.
 1004 Prince Street
 Alexandria, VA 22314

Re: Marcus Miai

S T A T E M E N T

Professional Services

		<u>Hours</u>	<u>Amount</u>
12/6/2011 V400	Review files for discovery responses; draft interrogatories & docs. emails to Stone	2.50	1,000.00
12/8/2011 V400	Motion to extend time discovery; motion to amend complaint; noticed motions; conf., Steve Stone	3.20	1,280.00
12/21/2011 BFA-	Holway & Altum depo. outlines	2.20	550.00
Total fees		7.90	\$2,830.00

Costs:

12/30/2011 December copies	0.20
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Total current costs	\$0.20
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Total new charges since last bill	\$2,830.20
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Total due:	\$2,830.20
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Steven David Stone, Esq.

Page 2

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bernadette Armand	2.20	250.00	\$550.00
V400	5.70	400.00	\$2,280.00

I.R.S. Identification No. 54-1217562

STEVEN DAVID STONE, P.C.

1004 Prince Street
Alexandria, VA 22314
(703) 684-0200

January 03, 2012

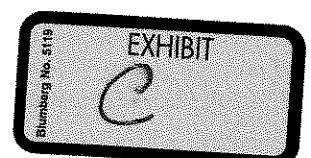
Mr. and Mrs. Marcus Mial
20010 Palmer Classic Parkway
Ashburn, VA 20147

Invoice No. 46707

Re: Dispute with Loudoun County Sheriff's Department

Professional Services

12/1/2011	SDS	Conference with Client / Case Planning / Conference with Paralegal / Revisions to Agreement
12/5/2011	SDS	Telephone Conference with Defendant's Attorney
	SDS	Telephone Conference with Attorney Glasberg
	SDS	Telephone Conference with U.S. District Court
	SDS	Conference with Client
	SDS	Review of Correspondence from Mr. Glasberg
	SDS	Scheduling with Attorney
	SDS	Memorandum to Paralegal
12/6/2011	SDS	Conference with Paralegal
	SDS	Message from Defendant's Attorney
	SDS	Review of Pleadings
	SDS	Scheduling / Review of Memorandum
	SDS	Memorandum to Attorney
	SDS	Review of Pleadings - Scheduling Order
	SDS	Review of Pleadings - Discovery Plan
	SDS	Case Planning - Discovery Deadlines
	SDS	Review of Correspondence from Attorney re: Discovery
12/7/2011	SDS	Correspondence to Attorney and Scheduling
	SDS	Review of Correspondence between County Attorney and Attorney Glasberg
	SDS	Review of Pleadings - Defendant's Interrogatories and Request for Production of Documents / Note Objections / Research
	SDS	Telephone Conferences with Attorneys
	SDS	Conference with Paralegal
	SDS	Telephone Conference with U.S. District Court
	SDS	Conference with Staff re: Scheduling with Client and Attorneys
	SDS	Review of Pleadings - Amended Complaint / Strategic Planning
	SDS	Review of Documents - Client Letters to Federal Officials
	SDS	Case Planning Memorandum to Attorney and Paralegal
	SDS	Questions for Attorney



Mr. and Mrs. Marcus Mial

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12/7/2011 SDS Review and revise draft Interrogatory Answers
 LBW Research E-Filing, PACER, and Local Rules of U.S. District Court
 SDS Review of Pleadings - Amended Complaint / Strategic Planning

12/8/2011 SDS Telephone Conference with Attorney Francuzenko re: Discovery due, Deadlines, and Amended Complaint / Conference with Paralegal
 SDS Outline Motions re: Amended Complaint and Discovery
 SDS Case Planning re: Discovery - written and depositions
 SDS Review of Memorandum re: Rules
 SDS Conference with Attorney Glasberg and transition records / Review of Documents
 SDS Revisions to Motion to File Amended Complaint and Consent Order
 SDS Revisions to Motion to Extend Discovery and Consent Order
 SDS Revisions to Amended Complaint / Memorandum to Paralegal re: Pleadings
 LY Research Federal Rules of Civil Procedure and FRE
 LBW Work on Answers to Interrogatories and Responses to Request for Production of Documents

12/9/2011 SDS Strategic Planning - Discovery and Motions / Outline Research
 SDS Review of Correspondence from Attorney
 SDS Conference with Paralegal
 SDS Additional Revisions to Pleadings
 SDS Correspondence to Attorney re: Orders
 SDS Telephone Conferences with U.S. District Court and Review of Court's ECF System and Manual / Submission of Test and Documents
 SDS Case Planning Conference with Client re: Discovery and Motions / Revisions to Motions for *Pro Se* filing
 SDS Telephone Conference with Defendant's Attorney
 SDS Review of Court filings and to Defendant's Attorney
 SDS Conference with Attorney re: Discovery Objections Research
 SDS Conference with Paralegal re: case organization and preparation of Interrogatories and Request for Production of Documents
 LY Telephone Conference with Clerk of Court, Eastern District of Virginia
 LY Memorandum to Attorney Stone
 LY Research ECF Filing Procedures
 LY Conference with Clerk of Court, Eastern District Federal Court
 LY Conference with office of Attorney Glasberg
 LBW Work on Motions, Amended Complaint, and Answers to Interrogatories

12/11/2011 LY Research Eastern District of Virginia Attorney Qualifying Procedure
 LY Review of Pleadings
 LY Research Rule 35 Psychiatric Evaluation Standards

12/12/2011 SDS Review of Documents from Client re: Interrogatories
 SDS Conference with Paralegal re: Discovery
 SDS Strategic Planning Conference with Attorney, Paralegal, and Staff re: Documents, Discovery, Motions, and Research
 LY Research Rule 35 Psychiatric Evaluation Case Law
 LY Memorandum to Attorney Stone
 LY Research HIPPA re: mental health records
 LY Conference with Attorney and Paralegal
 LA Review of Documents
 LA Create Notebooks - Client, Pleadings, and Defendant

Mr. and Mrs. Marcus Mial

Page 3

12/12/2011 LA Witness Notebook
 LA Case Planning Conference
 12/13/2011 SDS Conference with Attorney re: U.S. District Court and Motion Research
 SDS Review of Documents - Court Application
 SDS Telephone Conference with Dr. Carter
 SDS Revisions to Client's Responses to Request for Production of Documents
 SDS Conference with Staff re: Notebooks
 SDS Review of Federal Rules of Civil Procedure re: Discovery
 SDS Review of Pleadings - Missing disclosures
 SDS Review of Pleadings - Client's Interrogatory Answers / Revisions
 SDS Conference with Attorney re: Mental Health Records
 SDS Review of U.S. District Court Local Rules re: Response Brief
 SDS Review of Pleadings - Motions / Conference with Attorney re: Response Brief
 SDS Client Message
 SDS Case Planning Conference
 SDS Begin Review of Deposition Transcripts
 SDS Review of Pleadings - Final Draft Interrogatories
 SDS Review of and Revisions to Pleadings - Response to Request for Production of Documents
 LY Research Psychotherapist/Patient Confidentiality Privilege
 LY Revisions to Discovery Objections
 LY Conference with Attorney and Paralegal
 LBW Edit Answers to Interrogatories / Work on Responses to Request for Production of Documents
 and Motions for filing with Court
 LA Work on Client Documents Notebook
 LA Work on Pleadings Notebook
 LA Work on Defendant's Documents Notebook
 LA Set up Depositions Notebook
 LA Set up Police Reports Notebook
 LA Research Tasers
 LA Work on Depositions Notebook
 SDS Correspondence to Client re: Disc
 SDS Conference with Staff re: Taser Research
 SDS Begin Review of Deposition Transcripts
 12/14/2011 SDS Review of Taser Research
 SDS Conference with Staff re: Depositions
 SDS Case Planning Conference with Client re: Discovery / Client Revisions to Interrogatories and
 Request for Production of Documents / Conference with Paralegal
 SDS Correspondence to Attorney
 SDS Review of Pleadings - U.S. District Court / File Formal Appearance
 SDS Conference with Staff re: delivery of Discovery
 SDS Review of Documents - U.S. District Court re: Filing
 SDS Preparation and dictation of Certificates of Service / Finalize Motion Responses /
 Correspondence to Client / Correspondence to Attorney
 SDS Review of Correspondence from Attorney re: new Defendant
 SDS Memorandum to Paralegal
 LY Work on Response to Motion to Compel
 LBW E-File Answers to Interrogatories and Responses to Request for Production of Documents

*Mr. and Mrs. Marcus Mial**Page 4*

12/14/2011 LBW Conference with Client and Attorney re: filings
 LA Review and Digest Depositions
 LA Delivery to Defendant's Attorney
 LY Index and organize Research Notebook
 LY Conference with Attorney Glasberg
 LY Conference with Client
 12/15/2011 SDS Message from Attorney re: Motion
 SDS Conference with Staff re: Depositions and Summaries
 SDS Research and Preparation for Court Hearing
 LA Review of Depositions
 12/16/2011 SDS Conference with Expert - Ms. Drake
 SDS Review of Court Orders and set Deadlines
 SDS Court Appearance: U.S. District Court - Motions Hearing / Case Planning Conference
 SDS Telephone Conference with Attorney
 SDS Outline for Client
 SDS Memorandum to Paralegal re: Summons and Depositions
 SDS Research Service of Process
 LY Court Appearance with Attorney Stone, Eastern District of Virginia - Motions re: Discovery
 LA U.S. District Court Motions Hearing
 12/17/2011 LA Continue Review and Outline of Depositions
 12/18/2011 SDS Review of Deposition Summaries
 SDS Memorandum to Staff re: Next Summaries
 12/19/2011 SDS Conference with Staff
 SDS Review of Summons
 SDS Correspondence to Client
 SDS Review of Correspondence from Attorney
 SDS Review of Notes
 LBW Review of Local Rules and E-Filing re: Summons
 LBW Prepare Order Amending Style of Case for E-Filing
 LA Deposition Analysis
 12/20/2011 SDS Review of Videotape of Deposition practice
 SDS Review of Documents - Pictures
 SDS Review of Pleadings / Outline Supplemental Discovery
 SDS Conference with Paralegal
 SDS Correspondence to Dr. Carter
 SDS Correspondence to Ms. Drake
 SDS Correspondence to Attorney
 SDS Conference with Attorney re: Tasers
 SDS Telephone Conference with Client
 SDS Case Planning - Discovery
 LY Index and organize Case Law Notebook
 LY Research Taser and Use of Force
 LBW Correspondence
 LA Video Review
 12/21/2011 SDS Review of Correspondence from U.S. District Court and Conference with Paralegal
 SDS Case Planning - Depositions of Altom and Holway
 LBW Discovery

*Mr. and Mrs. Marcus Mial**Page 5*

12/21/2011 LY Index and organize Research Notebook (Case Law Review)
 12/22/2011 SDS Review of Documents - Police Photos
 SDS Check Response to Consent Order
 SDS Deposition Dates and Case Planning
 SDS Research and Strategic Planning re: Tasers
 LA Conference with Attorneys Stone and Young
 LBW Correspondence
 LBW Create and update Notebooks
 LY Review of Case Law and index and organize Research Notebook
 LY Conference with Attorney and Paralegal re: Case Strategy
 LY Review of Deposition of Officer Sherin
 12/23/2011 SDS Review of Correspondence
 SDS Conference with Staff
 SDS Telephone Conference with Dr. Carter
 SDS Telephone Conference with Ms. Drake
 SDS Telephone Conference with Client
 SDS Memorandum to Paralegal
 12/26/2011 SDS Review of Sherin Deposition Summary
 SDS Memorandum to Attorney
 SDS Review of Pleadings - Defendant's Discovery Responses
 12/27/2011 SDS Telephone Conference with Expert
 SDS Telephone Conference with Dr. Carter
 SDS Conference with Attorney re: Research
 SDS Review of Documents - Mental health records / Analysis
 SDS Review of Loudoun County Circuit Court Opinion
 12/28/2011 SDS Strategic Planning Conference with Experts (Dr. Carter and Ms. Drake) with Attorney and Staff / Outline Research with Attorney
 SDS Review of Federal Rules of Civil Procedure re: dismissal and re-filing
 SDS Review Recent Court Decisions
 SDS Case Planning Conference with Client and Attorney
 LY Review of Deposition of Officer Sayre
 LY Conference with Attorney Stone and Experts
 LY Conference with Attorney and Client [No Charge]
 LBW Transcription
 LBW Work on Discovery (Supplemental Responses)
 12/29/2011 SDS Client Message and Conference with Paralegal
 SDS Contact Dr. Carter's Staff
 SDS Review of Memorandum from Expert
 SDS Telephone Conference with Ms. Drake
 SDS Conference with Attorney re: Research for Motions
 SDS Conference with Paralegal re: Pleadings
 LY Review of Criminal Pleadings
 LY Review of Client Documents (Photos)
 LBW Review of Pleadings and draft Summons
 12/30/2011 LY Review of Ferguson Deposition
 LBW Summary of Deposition Transcript

Mr. and Mrs. Marcus Mial

Page 6

<i>Summary</i>			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Steven David Stone, Esquire	52.50	500.00	\$26,250.00
Luke Young, Esquire	23.00	300.00	\$6,900.00
L. B. Winoy, Paralegal	22.50	125.00	\$2,812.50
Legal Assistant	35.75	85.00	\$3,038.75

	<u>Amount</u>
<i>For Professional Services Rendered</i>	\$39,001.25

Costs

<i>Copies and Materials</i>	\$25.20
<i>Total Costs</i>	\$25.20

<i>Total New Charges</i>	\$39,026.45
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1/3/2012 Payment from Trust Account	(\$39,026.45)
<i>Please Replenish Client Funds with</i>	\$9,026.45

Balance Due	\$9,026.45
--------------------	-------------------

Client Funds Transactions

<i>Previous Balance of Client Funds</i>	\$0.00
12/6/2011 Payment to Account, Check No. 5299	\$15,000.00
12/8/2011 Payment to Trust Account by Credit Card	\$5,000.00
12/9/2011 Payment to Trust Account by Credit Card	\$5,000.00
1/3/2012 Payment to Trust Account--Check No. 5326	\$25,000.00
1/3/2012 Payment from Trust Account	(\$39,026.45)

<i>New Balance of Client Funds</i>	\$10,973.55
------------------------------------	--------------------

The balance due, if any, may be paid by check or credit card.

STEVEN DAVID STONE, P.C.

1004 Prince Street
Alexandria, VA 22314
(703) 684-0200

January 31, 2012

Mr. and Mrs. Marcus Mial
20010 Palmer Classic Parkway
Ashburn, VA 20147

Invoice No. 46743

Re: Dispute with Loudoun County Sheriff's Department

Professional Services

1/2/2012	SDS	Strategic Planning
1/3/2012	SDS	Review of Correspondence from Defendant's Attorney
	SDS	Review of Pleadings - Order
	SDS	Trial Planning Conference with Attorney and Paralegal
	SDS	Review of U.S. District Court Confirmation
	SDS	Client Message
	LY	Review and type notes on Sherin Deposition
	LY	Research Motion to Amend Discovery Pleadings
	LY	Conference with Attorney Stone and Paralegal
	LY	Motion to Extend Discovery
	LBW	Revisions to Pleadings / E-File Supplemental Discovery
	LBW	Deposition Summary
1/4/2012	SDS	Review of Documents - Case Review
	SDS	Review of Correspondence from Attorney
	SDS	Review of Pleadings - Deposition Notices
	SDS	Conference with Attorney
	SDS	Review of Pleadings - Supplemental Discovery Documents
	SDS	Review of evaluation status
	SDS	Revisions to Correspondence to Attorney
	SDS	Revisions to Discovery Motion
	SDS	Review of Case Law
	LY	Voice Mail Message to Dr. Carter
	LY	Telephone Conference with Client
	LY	Memorandum to Attorney Stone
	LY	Motion to Extend Discovery
	LY	Draft Correspondence to Attorney Francuzenko
	LY	Review of Correspondence from Attorney Francuzenko
	LY	Conference with Attorney Stone
	LY	Revise Correspondence to Attorney Francuzenko

*Mr. and Mrs. Marcus Mial**Page 2*

1/4/2012 LBW Update Notebooks
 LBW Telephone Conference
 1/5/2012 SDS Conference with Paralegal re: Defense Attorney's Appointment
 SDS Review of Correspondence from Defendant's Attorney re: Depositions
 SDS Memorandum to Staff
 SDS Telephone Conference with Defendant Attorney re: Depositions and Motion
 SDS Telephone Conference with Client re: Case Developments
 SDS Telephone Conference with Expert
 SDS Scheduling
 SDS Outline Pleadings
 SDS Letter to Trial Team
 LY Telephone Conference with Associated Clinical Services
 LY Correspondence to Dr. Carter
 LY Review of Correspondence from Attorney Francuzenko
 LY Case Planning Conference with Attorney Stone and Paralegal
 LY Telephone Conference with Dr. Carter
 LY Memorandum to Attorney Stone
 LBW Telephone Conference with Attorney Stone
 1/6/2012 LY Review of Correspondence from Trial Consultant Drake
 LY Voice Mail Message to Ms. Drake
 LY Voice Mail Message to Client
 LY Research - Extending Discovery Deadline
 LY Telephone Conference with Client
 1/8/2012 LY Review of Local Rules of Civil Procedure
 LY Review of Electronic Filing Rules
 1/9/2012 LY Telephone Conference with Ms. Drake
 LY Voice Mail Message to Client
 LY Revisions to Motion to Extend Discovery Deadline
 LY Memorandum to Attorney Stone
 1/10/2012 LBW Transcription / Prepare Pleadings
 SDS Revisions to Motion and work on Legal Brief to U.S. District Court
 LY Review of Correspondence from Dr. Carter
 LY Work on Brief in Support of Motion to Extend Discovery
 1/11/2012 LBW Telephone Conference with Clerk's Office, U.S. District Court
 LBW Appearance at Courthouse
 LBW Telephone Conference with Mr. Francuzenko
 LBW Telephone Conferences with Mr. Glasberg
 SDS Review of Documents from Dr. Carter - Initial Report / Case Planning
 SDS Memorandum to Attorney
 SDS Further Revisions to U.S. District Court Brief
 LY Research "interests of justice" standard
 LY Revise Motion and Brief
 LY Telephone Conference with Dr. Carter
 LY Memorandum Attorney Stone
 1/12/2012 SDS Finalize Motion and Brief for filing with U.S. District Court
 LY Review of Memorandum from Attorney Stone
 LY Telephone Conference with Dr. Carter

Mr. and Mrs. Marcus Mial

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1/12/2012 LY Correspondence to Client
 LY Telephone Conference with Client
 LY Telephone Conference with Theresa Mial
 LY Telephone Conference with On Trial Associates
 LY Review of Local Rules of Civil Procedure
 LY Telephone Conference with Clerk, Eastern District of Virginia
 LBW Appearance at office of Attorney Francuzenko
 LBW Update Notebook
 LBW E-File Pleadings
 1/13/2012 LY Conference with Paralegal re: Notice of Deposition
 LY Review of Federal Rules of Civil Procedure
 LY Memorandum to Attorney Stone
 LY Draft Correspondence to Judge Davis
 LY Review of Correspondence from Eastern District of Virginia Clerk
 LY Correspondence to Attorney Francuzenko
 LY Memorandum to Attorney Stone re: Docketing for January 27th
 LY Telephone Conference with Attorney Francuzenko
 LY Memorandum to Attorney Stone re: Telephone Conference with Mr. Francuzenko
 LY Draft Subpoena - Officer Holway
 LY Conference with Paralegal re: Police Officer Subpoenas
 LY Telephone Conference with Client
 LBW Update Research Notebook
 LBW Telephone Conference with Clerk of Court
 LBW Draft Notices of Deposition
 LBW Transcription / E-File Pleadings
 LY Telephone Conference with Ms. Drake
 LY Correspondence to Ms. Drake
 LY Conference with Clerk, Judge's Chambers, Eastern District of Virginia
 SDS Review of Correspondence from Attorney with Deposition Certification
 1/15/2012 LY Conference with Client and Consultant Drake
 LY Telephone Conference with Dr. Carter
 LY Conference with Client, Ms. Drake, and Ms. Mial
 LY Conference with Ms. Drake
 1/16/2012 LY Memorandum to Attorney Stone
 LY Telephone Conference with Client
 LBW Update Notebook
 SDS Client Message
 SDS Review of Attorney's Memorandum
 1/17/2012 SDS Conference with Attorney
 SDS Case Planning Conference with Consultant
 SDS Conference with Paralegal
 LY Conference with Attorney Stone
 LY Telephone Conference with On Trial Associates
 LY Memorandum to Attorney Stone: Notes from January 15th Deposition Preparation
 LBW Update Notebook
 LY Telephone Conference with Client
 LY Telephone Conference with Ms. Drake and Attorney Stone

*Mr. and Mrs. Marcus Mial**Page 4*

1/17/2012 SDS Review of Deposition Session Summary / Strategic Planning
 SDS Review of Pleadings - Affidavits of Service of Deposition Subpoenas
 1/18/2012 SDS Conference with Client to prepare for Deposition
 SDS Client Message
 SDS Conference with Staff re: Scheduling
 SDS Conference with Attorney re: Depositions
 SDS Review of Correspondence from Attorney re: Deposition
 SDS Telephone Conference with Expert
 SDS Review of Federal Rules of Civil Procedure and FRE / Preparation for Client Deposition
 LY Conference with Client and Attorney Stone re: Deposition Preparation
 1/19/2012 SDS Conference with Paralegal re: PreTrial deadlines
 SDS Appearance at Deposition of Client
 SDS Deposition De-briefing
 LY Attend Deposition
 1/20/2012 SDS Review of Correspondence from Client re: 911 Tapes
 SDS Telephone Conference with Attorney re: Depositions
 SDS Case Planning - Additional Discovery and Supplementation
 SDS Review of Notes - Mr. Kirkland / Case Planning
 SDS Review of Documents from Expert
 LY Review of 911 sound files
 LY Review of Attorney Glasberg's notes re: Witness Kirkland
 LY Memorandum to Attorney Stone
 1/22/2012 SDS Conference with Clients to prepare T. Mial's Deposition / Conference with Attorney / Case Planning
 SDS Draft Supplemental Response to Defendant's Request for Production of Documents
 SDS Draft Certificate of Service
 SDS Reminders re: Deposition reset
 SDS Memorandum to Paralegal re: Kirkland Meeting
 SDS Review of Pleadings - Previous Discovery to Defendants
 SDS Outline Interrogatories, Request for Production of Documents, and Request for Admissions to new Defendant
 LY Conference with Client and Theresa Mial with Attorney Stone - Deposition Preparation
 1/23/2012 SDS Telephone Conference with Attorney
 SDS Appearance at Deposition of Therese Mial
 SDS Telephone Conference with Dr. Carter's Staff
 SDS Case Planning Conference re: Court Research
 SDS Review of Court Procedures for Motions and ruling appeals / Case Planning
 SDS Telephone Conference with Court Reporter
 SDS Telephone Conference with Ms. Drake
 LBW Transcription
 LY Conference with Clerk, Eastern District of Virginia, re: Summons
 1/24/2012 LBW Transcription
 LBW Review of Pleadings
 LBW Update Notebook
 SDS Review of Pleadings - Loudoun County Circuit Court lawsuits v. Toll Bros. / Conference with Attorney
 SDS Further Research to Attorney

*Mr. and Mrs. Marcus Mial**Page 5*

1/24/2012 SDS Correspondence to Private Process Server
 SDS Review of Local Rules
 SDS Telephone Conference with Ms. Drake re: Depositions / Case Planning
 SDS Review of 911 Tapes
 SDS Review of Documents - Notes and Correspondence
 LY Conference with Clerk, Fairfax County General District Court, re: criminal records
 LY Memorandum to Attorney Stone
 1/25/2012 SDS Conference with Dr. Carter
 SDS Review of Pleadings - Defendant's Motion Response / Research Cases
 LY Research Taser Experts
 LY Memorandum to Attorney Stone
 LY Conference with Paralegal re: Motions preparation and proposed Order
 LY Review of Pleadings
 LY Draft summary of case law re: Motion to Extend Discovery
 LBW Review of Pleadings
 LBW Draft Pleadings
 SDS Review of Correspondence from Attorney
 LY Index case law re: Motion to Extend Discovery
 1/26/2012 SDS Telephone Conference with Private Process Server re: Officer Altom
 SDS Conference with Paralegal re: Hearing Preparation
 LBW Research / Prepare Notebook and Case for Court
 SDS Research and Preparation for Court Hearing
 1/27/2012 SDS Court Appearance: U.S. District Court - Motion for Extension of Discovery and Experts /
 Conference with Defense Attorney
 SDS Telephone Conference with Client
 SDS Voice Mail Message to Dr. Carter
 SDS Review of Correspondence from Process Server
 SDS Review of Federal Rules of Civil Procedure
 SDS Review of Pleadings re: Court Hearing
 SDS Correspondence to Dr. Carter re: Case Requirements and Federal Rules of Civil Procedure
 SDS Trial Planning Conference with Attorney and Paralegal re: Depositions, Experts, Supplemental
 Discovery, and Subpoena Duces Tecum
 SDS Draft Supplemental Discovery issues
 SDS Correspondence to Client
 SDS Preparation and dictation of Notices of Rescheduled Depositions
 LY Court Appearance: Eastern District of Virginia - Motion to Extend Discovery
 LY Copy Sound Files of 911 Tapes for Production
 LY Research FRE Amendments
 LY Memorandum to Attorney Stone
 LY Conference with Attorney Stone and Paralegal
 LBW Transcription
 1/30/2012 SDS Review of Electronic Redaction Rules
 SDS Review of Pleadings
 SDS Revisions to Correspondence to Client
 SDS Revisions to draft Pleadings
 SDS Conference with Paralegal
 SDS Review of Pleadings - Two Court Orders

Mr. and Mrs. Marcus Mial

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1/30/2012 SDS Correspondence to Client
 SDS Telephone Conference with Dr. Carter
 SDS Telephone Conference with Court Reporter
 SDS Scheduling with Witness / Review of Memorandum from Paralegal
 SDS Review of Memorandum re: Mr. Kirkland
 LBW Pleadings
 LBW Transcription
 LBW Telephone Conferences with Dr. Carter
 LBW Telephone Conference with Court Reporter
 1/31/2012 LY Draft Correspondence to Dr. Carter
 LY Organize and file Client Documents
 LY Memorandum to Attorney Stone
 SDS Telephone Conference with Mr. Kirkland - Witness
 SDS Review of Correspondence from Dr. Carter
 SDS Review of Transcript
 SDS Review of Pleadings - drafts

Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Steven David Stone, Esquire	77.25	500.00	\$38,625.00
Luke Young, Esquire	69.75	0.00	\$0.00
L. B. Winoy, Paralegal	29.00	0.00	\$0.00

Amount*For Professional Services Rendered*

\$38,625.00

Costs

Legal Research Materials	\$155.40
Travel	\$53.40
Copies and Materials	\$152.40
Postage	\$8.94

Total Costs

\$370.14

Total New Charges

\$38,995.14

1/31/2012 Payment from Trust Account

(\$24,836.35)

Please Replenish Client Funds with

\$20,000.00

Balance Due\$34,158.79

*Mr. and Mrs. Marcus Mial**Page 7*Amount*Client Funds Transactions*

<i>Previous Balance of Client Funds</i>	\$10,973.55
1/9/2012 Payment to Trust Account--Check No. 5329 (Expert's Retainer Fee)	\$5,000.00
1/25/2012 Check No. 1704 to On Trial Associates (Invoice No. 1401)	(\$3,307.00)
1/26/2012 Payment to Trust Account--Check No. 5338	\$15,000.00
1/27/2012 Check No. 1709 to Victor M. Glasberg & Associates	(\$2,830.20)
1/31/2012 Payment from Trust Account	(\$24,836.35)
<i>New Balance of Client Funds</i>	<u>\$0.00</u>

The balance due, if any, may be paid by check or credit card.

After review of your bill, all time charged by the associate Attorney and the Paralegal (a total of 98.75 hours) has been incorporated into Mr. Stone's billing. This has reduced your bill in the amount of \$24,550.00.

STEVEN DAVID STONE, P.C.

1004 Prince Street
Alexandria, VA 22314
(703) 684-0200

March 06, 2012

Mr. and Mrs. Marcus Mial
20010 Palmer Classic Parkway
Ashburn, VA 20147

Invoice No 46889

Re: Lawsuit Against Loudoun County Sheriff's Department – U.S.
District Court

Professional Services

2/1/2012	SDS	Review of Correspondence from Client
	SDS	Voice Mail Message to Client
	SDS	Conference with Paralegal re: new Discovery and Client's supplemental Discovery
	SDS	Review of Correspondence from Dr. Carter
	SDS	Telephone Conference with Dr. Carter's Staff
	SDS	Client Message
	SDS	Scheduling
	LBW	Prepare Pleadings
	LY	Review of Request for Admissions
	LY	Review of Request for Production of Documents
2/2/2012	SDS	Review of Taser article
	SDS	Review of Correspondence from Defendant's Attorney re: Kirkland
	SDS	Review of Pleadings - Affidavit from Process Server
	SDS	Conference with Paralegal re: filing Affidavit
	SDS	Client Message
	SDS	Correspondence to Dr. Carter
	SDS	Conference with Paralegal to transmit Documents
	SDS	Scheduling
	SDS	Updated DSM Information
	SDS	Correspondence to Defendant's Attorney re: Deposition
	SDS	Telephone Conference with Client
	SDS	Memorandum to Staff
	LBW	Transcription / Filing with Court
2/3/2012	SDS	Review of Correspondence from Attorney
	SDS	Correspondence to Attorney
	SDS	Review Recent Court Decisions - U. S. Supreme Court
	SDS	Case Planning Conference
	SDS	Status of Dr. Carter's Reports and Information
	SDS	Review of Notice of Appeal of Magistrate's Order by Defendants / Conference with Paralegal

*Mr. and Mrs. Marcus Mial**Page 2*

2/3/2012 LY Conference with Dr. Carter re: Taser Information
 2/4/2012 SDS Conference with Attorney
 2/5/2012 SDS Case Planning re: Motion
 2/6/2012 SDS Telephone Conference with Dr. Carter's Staff
 SDS Conference with Paralegal re: Pleadings
 SDS Conference with Staff - Scheduling
 SDS Telephone Conference with Attorney
 SDS Research Federal Rules of Civil Procedure and Local Rules re: Expert Disclosure
 SDS Outline Expert Witness Disclosure
 SDS Correspondence to Dr. Carter re: Report and Outline
 SDS Review of Research for Defendant's Motion Response / Conference with Attorney
 SDS Review of Memorandum re: Federal Rules of Evidence
 SDS Review of Correspondence from Court Reporter
 SDS Conference with Paralegal
 SDS Correspondence to Client
 SDS Research Post Traumatic Stress Disorder
 SDS Review of Taser Research
 SDS Dr. Carter's Information Update
 SDS Revisions to Pleadings
 LY Review of Pleadings
 LY Draft response to Defendants' Objections
 LY Review of Case Law re: Standard of Review
 LY Index and Summarize Case Law re: Defendants' Objections
 LBW Court Filing
 LBW Transcription / Draft Pleadings
 LY Research case law re: Objections to Magistrate's Ruling
 2/7/2012 SDS Correspondence to Dr. Carter re: Depositions
 SDS Correspondence to Ms. Drake re: Depositions
 SDS Review of U.S. District Court Notice
 SDS Review of Correspondence from Court Reporter
 SDS Conference with Dr. Carter
 SDS Review of draft Pleadings
 LBW Update Notebook [No Charge]
 2/8/2012 SDS Revisions to and complete Plaintiff's Disclosure of Expert Witness with Report and Attachments
 SDS Revisions to Response to Defendants' Appeal of Discovery Order to Judge Lee
 SDS Review of Federal Rules of Civil Procedure and Local Rules re: Redactions and Depositions / Conference with Paralegal
 SDS Correspondence to Dr. Carter
 SDS Correspondence to Ms. Drake
 SDS Case Planning Conference with Attorney and Paralegal re: Discovery and upcoming Motions
 LBW Transcription
 LBW Update Pleadings Notebook
 LBW Filing Pleadings
 LBW Update Notebook / Create Notebook
 LBW Conference with Attorney Stone [No Charge]
 LY Review of Response to Defendants' Objections

*Mr. and Mrs. Marcus Mial**Page 3*

2/8/2012 LY Draft Plaintiff's Objections to Ruling
 2/9/2012 SDS Review of Pleadings - Client's Previous Interrogatories
 SDS Drafting and Revisions to Client's Supplemental Interrogatory Answers
 SDS Conference with Paralegal re: Discovery
 SDS Review of Client's Deposition
 SDS Review of Memorandum re: CLC designation
 SDS Revisions to Certification re: Discovery
 SDS Case Planning Conference with Client re: Discovery Motions, with revisions to and approval of Supplemental Interrogatory Answers
 SDS Revisions to Notice of Hearing, Plaintiff's Objections to Magistrate's Ruling, and Plaintiff's Response to Defendants' Motion
 SDS Telephone Conference with Defendants' Attorney re: Depositions and Motions
 LBW Draft Pleadings
 LBW Revisions to Pleadings
 LY Review of Response to Defendants' Objections
 LY Review of Plaintiff's Objections
 LY Conference with Attorney Stone and Paralegal
 2/10/2012 SDS Finalize Response Brief to Defendants' Motion, Plaintiff's Appeal re: Experts, and Notice of Hearing
 SDS Trial Planning Conference with Attorney Glasberg
 SDS Correspondence to Attorney
 LBW E-file and update Notebook
 LBW E-file Motion
 LY Review of Plaintiff's Objections
 2/12/2012 SDS Trial Planning - Discovery / Conference with Attorney / Add Subpoena Duces Tecum
 SDS Review of three Defendant Depositions
 SDS Review of proposed areas of next Depositions
 2/13/2012 SDS Conference with Paralegal re: Filing Motions
 SDS Conference with Attorney re: Discovery
 SDS Telephone Conference with Kirklands re: Depositions
 SDS Correspondence to Attorney re: Kirkland Depositions
 SDS Review of Documents produced by Defendants / Research Constitutional Law / Preparation for Depositions
 LBW Transcription
 LBW Review of Deposition
 LBW Delivery to Judge Lee
 LY Review of Pleadings
 2/14/2012 SDS Telephone Conference with Attorney re: Depositions
 SDS Conference with Paralegal
 SDS Correspondence to Mr. Glasberg
 SDS Review of Pleadings - Draft new Discovery / Revisions and Conference with Attorney to finalize
 SDS Telephone Conference with Court Reporter
 SDS Preparation for Depositions (Holway and Defendant Altom)
 LBW Telephone Conference with Attorney Francuzenko
 LBW Review of CD Documents
 LBW Prepare Pleadings

*Mr. and Mrs. Marcus Mial**Page 4*

2/14/2012 LBW Update Notebook / Case Organization
 LY Review of Certificate of Discovery
 LY Review of Request for Admissions (Altom)
 LY Review of Plaintiff's First Interrogatories to Defendant Altom
 LY Research Sheriff's General Orders
 LY Finalize Certificate of Discovery
 LY Finalize Request for Admissions to Defendant Altom
 LY Finalize Plaintiff's First Interrogatories to Defendant Altom
 LY Finalize Request for Production of Documents
 LY Conference with Attorney Stone re: Interrogatories
 LY Revisions to Plaintiff's First Interrogatories to Defendant Altom
 LY Review of Defendant's Response to Objections
 2/15/2012 SDS Review of Pleadings - Defendants' Response to Plaintiff's Objections and Responses / Analysis
 SDS Appearance at Depositions of Sgt. Holway and Deputy Altom
 SDS Conference with Client and Conference with Attorney
 SDS Conference with Paralegal re: Hearing Preparation
 LY Attend Deposition of Sgt. Holway
 LBW Summarize Deposition / Update Notebook / Review of Documents
 LBW Transcription
 2/16/2012 SDS Review of Pleadings - Notice of Kirkland Depositions
 SDS Conference with Paralegal
 SDS Correspondence to Kirklands
 SDS Review of Memorandum re: Delivery to Judge Lee
 SDS Plaintiff's Fourth Supplement to Defendant's Request for Production of Documents
 SDS Conference with Attorney re: Research Notebook Preparation
 SDS Telephone Conference with Attorney re: Hearing and Scheduling
 SDS Telephone Conference with Judge Lee's Law Clerk
 SDS Conference with Paralegal and Attorney
 SDS Preparation for Court Hearing
 SDS Review of Pleadings - Defendant Altom's Answer to Amended Complaint / Correspondence to Client
 LBW Summarize Client's Deposition
 LBW Transcription / Create and Update Notebooks
 LBW E-file Pleadings
 LBW Transcription
 LY Prepare Trial Notebook: Objections to Ruling
 LY Conference with Attorney Stone and Paralegal re: Trial Notebook
 2/17/2012 SDS Conference with Paralegal
 SDS Review of Correspondence from Defendants' Attorney re: I.M.E.
 SDS Correspondence to Client re: I.M.E.
 SDS Correspondence to Dr. Carter
 SDS Correspondence to Mr. Francuzenko re: Discovery
 SDS Review of Federal Rules of Civil Procedure, Rule 35
 SDS Case Planning
 LBW Update Notebook
 LBW Transcription
 LBW Deposition Summary

Mr. and Mrs. Marcus Mial

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2/20/2012 LBW Deposition Summary
 LBW Transcription
 LBW Transcription
 2/21/2012 SDS Client Message
 SDS Conference with Staff re: Scheduling
 SDS Trial Planning - Time Line
 LBW Deposition Summary
 LBW Update Notebook
 2/22/2012 SDS Kirkland Deposition issues
 SDS Review of Pleadings - Judge Lee's Order
 SDS Correspondence to Client
 SDS Scheduling
 SDS Review of Correspondence from Dr. Carter
 SDS Telephone Conference with Client
 SDS Telephone Conference with Dr. Carter re: I.M.E.
 SDS Correspondence to Defendant Attorney re: I.M.E.
 SDS Memorandum to Paralegal
 LBW Review of Documents
 LBW Conference with Attorney Stone
 LBW Telephone Conference with Dr. Carter
 LBW Transcription
 LBW Telephone Conference with Attorney Francuzenko
 2/23/2012 SDS Review of Correspondence from Defendant's Attorney
 SDS Review of Documents - Curriculum Vitae of Dr. Gold
 SDS Conference with Paralegal
 LBW Telephone Conference with Attorney Francuzenko's office
 LBW Transcription
 LBW Telephone Conference
 2/24/2012 SDS Client Message and Response
 SDS Case Planning - Subpoena Duces Tecum
 LBW Transcription
 LY Telephone Conference with Client
 LY Memorandum to Attorney Stone
 2/26/2012 SDS Case Planning Conference with Attorney and Paralegal re: Depositions and Subpoena Duces Tecum
 2/27/2012 SDS Deposition Planning
 SDS Conference with Staff re: Scheduling with Dr. Carter
 SDS Checklists for Attorney and Client
 SDS Review of Federal Rules of Civil Procedure and Local Rules
 SDS Conference with Paralegal re: Subpoena Duces Tecum
 SDS Telephone Conference with Mr. and Mrs. Kirkland to prepare for their Depositions
 SDS Draft Subpoena Duces Tecum to Sheriff
 SDS Correspondence to Defendant Attorney
 SDS Correspondence to Loudoun County Attorney
 SDS Review of Documents - Dr. Gold's background and publications
 SDS Correspondence to Dr. Carter re: Dr. Gold
 SDS Preparation for Depositions

Mr. and Mrs. Marcus Mial

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2/27/2012 LY Conference with Paralegal re: Subpoena Duces Tecum
 LY Review of Correspondence from Attorney Francuzenko
 LY Voice Mail Message to Attorney Francuzenko
 JEJ Draft Subpoena Duces Tecum on Loudoun County Sheriff Custodian of Records
 JEJ Conference with Attorney Stone and Attorney Young re: Service of Process
 JEJ Telephone Conference with Process Server
 JEJ Telephone Conferences (three) with Process Server to coordinate Service of Process
 2/28/2012 SDS Review of Documents - Client Errata Deposition Sheet
 SDS Outline Supplemental Interrogatory
 SDS Arrangements with Dr. Carter
 SDS Correspondence to Court Reporter
 SDS Appearance at Depositions of Mr. and Mrs. Kirkland
 SDS Telephone Conference with Client
 SDS Conference with Attorney re: Completion of Discovery phase
 SDS Preparation and dictation of Notice of Deposition
 SDS Correspondence to Attorney re: Deposition
 SDS Telephone Conference with Dr. Carter
 SDS Preparation and dictation of Supplemental Interrogatories
 SDS Review of Correspondence from Process Server
 JEJ Telephone Conference to confirm service of Subpoena Duces Tecum on Loudoun County Sheriff Custodian of Records
 JEJ Prepare Certificate of Service for filing with U.S. District Court
 JEJ Supplemental Witness Information from Client
 JEJ Prepare Email Correspondence to Client requesting further Witness Information
 JEJ Telephone Conference with Dr. Carter's office re: Deposition availability
 JEJ Memorandum to Attorney Stone
 2/29/2012 SDS Review of Correspondence and Documents from Defendant Attorney
 SDS Scheduling with Dr. Carter
 SDS Scheduling Expert Depositions / Telephone Conference with Court Reporter
 SDS Correspondence to Defendant Attorney
 SDS Arrange for transmission of Pleadings
 SDS Revisions to Pleadings
 SDS Conference with Paralegal
 SDS Review of Deposition Errata / Message to Client
 JEJ Draft Second Supplemental Interrogatory Responses
 JEJ Revisions to Certificate of Service
 JEJ Telephone Conference with Dr. Carter's office
 JEJ Review of Transcript of Client's Deposition
 JEJ Memorandum to Attorney Stone re: scheduling Dr. Carter's Testimony
 JEJ Meet with Client for execution of Errata Sheet and Answers to Second Supplemental Interrogatories
 JEJ Prepare ECF of Subpoena Duces Tecum, Certificate for Discovery, and Depositions Notice

Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
J. Jackson, Paralegal	6.25	125.00	\$781.25
Steven David Stone, Esquire	95.50	500.00	\$47,750.00

Mr. and Mrs. Marcus Mial

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<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Luke Young, Esquire	24.25	300.00	\$7,275.00
L. B. Winoy, Paralegal	33.50	125.00	\$4,187.50

Amount*For Professional Services Rendered*

\$59,993.75

Costs

Legal Research Materials	\$12.00
Process Server's Fee (two Loudoun County Deputies)	\$164.00
Process Server's Fee (N. Altom)	\$80.00
Express Mail and Delivery	\$32.00
Copies and Materials	\$163.20
Facsimile	\$15.50
Postage	\$10.35
Travel	\$21.09

Total Costs

\$498.14

Total New Charges

\$60,491.89

Previous Balance

\$14,158.79

2/9/2012 Payment from Trust Account	(\$14,158.79)
2/29/2012 Credit fees billed by Attorney Young	(\$7,275.00)
2/29/2012 Credit fees billed by L. B. Winoy, Paralegal	(\$4,187.50)
2/29/2012 Credit fees billed by J. Jackson, Paralegal	(\$781.25)
2/29/2012 Fees billed by Mr. Stone voluntarily capped at \$45,000.00.	(\$2,750.00)
3/6/2012 Payment from Trust Account	(\$44,958.21)
<i>Please Replenish Client Funds with</i>	\$20,000.00

Balance Due**\$20,539.93***Client Funds Transactions**Previous Balance of Client Funds*

\$0.00

2/9/2012 Payment to Trust Account--Check No. 5354	\$25,000.00
2/9/2012 Payment from Trust Account	(\$14,158.79)
2/13/2012 Payment to Trust Account--Check No. 5355	\$10,000.00
2/23/2012 Check No. 1714 to Court Reporter	(\$638.25)
2/28/2012 Check No. 1716 to Court Reporter	(\$244.75)
2/29/2012 Payment to Trust Account--Check No. 5368	\$25,000.00

Mr. and Mrs. Marcus Mial

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	<u>Amount</u>
3/6/2012 Payment from Trust Account	<u>(\$44,958.21)</u>
<i>New Balance of Client Funds</i>	<u><u>\$0.00</u></u>

The balance due, if any, may be paid by check or credit card.

Fees billed by Paralegals and Attorney Young have been donated and credited in their entirety. Attorney Stone's fees have been voluntarily capped at \$45,000.00, resulting in an additional credit of \$2,750.00.

STEVEN DAVID STONE, P.C.

1004 Prince Street
Alexandria, VA 22314
(703) 684-0200

March 31, 2012

Mr. and Mrs. Marcus Mial
20010 Palmer Classic Parkway
Ashburn, VA 20147

Invoice No. 46951

Re: Lawsuit Against Loudoun County Sheriff's Department -- U.S.
District Court

Professional Services

3/1/2012	SDS	Review of Correspondence from Defendant's Attorney
	SDS	Review of Correspondence from U.S. District Court
	SDS	Review of Memorandum re: Client Conference
	SDS	Review of Pleadings - Affidavit of Subpoena Duces Tecum Service
	JEJ	Telephone Conference with Court Reporter re: Errata Sheets
	JEJ	Prepare transmission of Errata and Acknowledgement for service on Counsel
	JEJ	Memorandum to Attorney Stone re: Meeting with Client and status of Ms. Mial's Errata Sheet
	JEJ	Prepare calendar of remaining discovery and pre-trial events
3/2/2012	SDS	Deposition Scheduling
	SDS	Review of Correspondence from Defendant's Attorney re: Dr. Gold's Deposition
	SDS	Memorandum to Paralegal
	SDS	Telephone Conference with Court Reporter
	SDS	Review of Correspondence from Court Reporter re: Holway-Alton Depositions
	SDS	File Affidavit with U.S. District Court
3/5/2012	SDS	Review of Pleadings - Expert Report Disclosure / Review of Documents - Dr. Gold's Report / Case Planning
	JEJ	Order Testimony Transcripts (Holway and Altom)
	JEJ	Telephone Conferences with T. Mial / Preparation of her Errata Sheet
	JEJ	Memorandum to Attorney Stone re: discussions with T. Mial
	JEJ	Telephone Conference with Court Reporter to request extension of time for T. Mial's Errata Sheet
	JEJ	Telephone Conference with opposing Counsel re: extension
	JEJ	Receive and provide copies to Client and Expert of IME Report and Submission to Court
	JEJ	Prepare Correspondence to Client re: expert fee required by Dr. Gold
	JEJ	Prepare correspondence to our expert to request his charge to defendants for taking his deposition
	SDS	Review of Correspondence from Court Reporter
	SDS	Review of Correspondence from Dr. Carter re: his Deposition
3/6/2012	SDS	Telephone Conference with Dr. Carter

*Mr. and Mrs. Marcus Mial**Page 2*

3/6/2012 SDS Conference with Paralegal re: Errata Sheet
 SDS Telephone Conference with Defendant
 SDS Telephone Conference with Court Reporter re: Depositions
 SDS Correspondence to Court Reporter
 SDS Preparation for Conference with Expert
 JEJ Receive and Review Client Errata Sheet
 JEJ Memorandum to Attorney Stone re: status of Holway and Altom Transcripts
 JEJ Prepare Correspondence to Client re: cost associated with Transcripts
 JEJ Telephone Conference with Court Reporter re: extension of time to serve Errata Sheet
 JEJ Telephone Conference with T. Mial re: status of her Errata Sheet
 SDS Review of Transcript Estimate
 3/7/2012 SDS Conference with Dr. Carter to develop Rebuttal and prepare for Depositions
 SDS Review of Memoranda re: Deposition issues
 JEJ Telephone Conference with Ms. Mial re: status of finalizing her Errata Sheet
 SDS Case Planning Conference re: Experts / Review of Documents - Ms. Mial's potential Deposition Errata
 3/8/2012 SDS Review of Pleadings - Defendant Altom's Objections to Discovery
 JEJ Two Telephone Conferences with Ms. Mial re: appointment to execute Errata Sheets
 JEJ Finalize Ms. Mial's Errata Sheets for execution
 JEJ Response from Client re: deposit for Gold Deposition
 3/9/2012 SDS Telephone Conference with Attorney
 SDS Client Message and Questions
 SDS Conference with Paralegal re: Deposition
 SDS Telephone Conference with Dr. Carter's Staff
 SDS Review of Documents from Dr. Carter - Rebuttal Letter
 SDS Conference with Paralegal re: Revisions
 JEJ Transcribe correspondence to opposing Attorney re: Dr. Gold's fee
 JEJ Correspondence to Dr. Carter re: edit to his Rebuttal
 JEJ Meet with Ms. Mial for execution of Errata Sheets
 JEJ Transmit Errata to Court Reporter for service
 JEJ Communication from Court Reporter re: Holway Transcript
 3/11/2012 SDS Trial Planning - Witnesses and Exhibits / Case Planning - Dispatcher Deposition and Expert Rebuttal
 SDS Review of Pleadings - Subpoena Duces Tecum issue with Sheriff and Memorandum to Attorney
 3/12/2012 SDS Trial Planning Conference with Attorneys Glasberg and Young
 SDS Review of status of Subpoena Duces Tecum and obtaining Documents
 SDS Response to Defendant's Attorney re: Inquiries
 SDS Review of Pleadings - Previous Expert Filings
 SDS Preparation and dictation of Plaintiff's Disclosure of Rebuttal to Defendant's Expert / Conference with Paralegal
 SDS Review of Documents - Dr. Carter's final Rebuttal Report
 SDS Conference with Attorney re: Exhibits Book
 SDS Review of Documents from U.S. District Court
 SDS Review of Documents from Sheriff pursuant to Subpoena Duces Tecum
 JEJ Transcribe Plaintiff's Rebuttal of Defendant's Expert Witness
 JEJ Prepare and complete electronic filings to U.S. District Court (Rebuttal)

Mr. and Mrs. Marcus Mial

Page 3

3/12/2012 JEJ Telephone Conference with opposing Counsel re: availability of their response to Subpoena Duces Tecum
 JEJ Memorandum to Attorney Stone re: status of Defendant's Discovery
 LY Draft list of Witnesses
 LY Draft list of Exhibits
 LY Conference with Attorney Glasberg and Attorney Stone
 LY Telephone Conference with Attorney Francuzenko
 LY Review of Sheriff's Documents produced in response to Subpoena Duces Tecum
 SDS Telephone Conference with Defendant's Attorney re: Deposition
 3/13/2012 SDS Correspondence to Attorney re: Dr. Carter's Deposition
 SDS Telephone Conference with Dr. Carter
 SDS Forward Transcripts
 SDS Telephone Conference with Client
 SDS Trial Planning - Exhibits
 SDS Trial Planning - Witnesses
 JEJ Telephone Conference re: Dr. Carter's upcoming Deposition
 LY Prepare Exhibit Notebook
 LY Conference with Attorney Stone re: Exhibits
 3/14/2012 SDS Review of Sgt. Holway's Deposition
 SDS Correspondence to Client and Conference with Paralegal
 SDS Correspondence to Attorney re: Deposition
 SDS Preparation and dictation of Notice of Rescheduled Deposition
 SDS Telephone Conference with Defendant's Attorney
 SDS Review of Local Court Rules and Federal Rules of Civil Procedure
 SDS Review of Pleadings - List of Witnesses / Revisions
 SDS Review of Pleadings - Exhibits Notebook / Revisions
 SDS Review of Pleadings - Court Orders
 SDS Review of Correspondence from Court Reporter
 SDS Review of Pleadings - Notice of Deposition to Dr. Carter
 SDS Review of Correspondence from Attorney re: Deposition
 SDS Check Case Deadlines
 SDS Telephone Conference with Attorney re: Pre-Trial
 SDS Preparation for Court: Review of Calendar for Scheduling Motions and Trial
 JEJ Correspondence to opposing Counsel re: Huntley Deposition re-scheduled
 JEJ Prepare Notice of rescheduling of Huntley Deposition
 JEJ Duplicate, scan, and email Mials' Deposition transcripts to Dr. Carter
 LY Prepare Exhibit Notebook
 LY Conference with Attorney Stone
 LY Telephone Conference with Client
 LY Update/Revise Exhibit Notebook
 SDS Review of Documents from Client / Conference with Attorney
 3/15/2012 SDS Review of Correspondence from Court Reporter re: Filing T. Mial Errata Sheet
 SDS Court Appearance: U.S. District Court Pre-Trial Conference with Judge Lee
 SDS Review of Pleadings - Defendant's List of Witnesses and Defendant's List of Exhibits
 SDS Review of Correspondence from Court Reporter re: Altom Deposition
 SDS Conference with Attorney and Review of Amended Witness and Exhibits Lists

*Mr. and Mrs. Marcus Mial**Page 4*

3/15/2012 JEJ Produce, duplicate, and scan Depositions Transcripts of Sayre, Sherin, and Ferguson / Forward to Dr. Carter
 JEJ Prepare electronic filing of Plaintiff's Witness and Exhibit Lists
 LY Court Appearance: U.S. District Court - Pre-Trial Conference
 LY Review of List of Witnesses
 LY Review of List of Exhibits
 LY Conference with Paralegal re: filing Exhibits
 3/16/2012 SDS Conference with Staff
 SDS Telephone Conference with Client
 SDS Telephone Conference with Attorney re: Briefing Schedule and Trial
 JEJ Memorandum to Attorney Stone re: Court reporter and Dr. Carter's Deposition
 3/17/2012 JEJ Memorandum to Attorney Stone re: transmisison of transcripts to Dr. Carter for Deposition
 JEJ Scan and email Holway Deposition to Dr. Carter
 3/18/2012 SDS Depositions to Dr. Carter
 3/19/2012 SDS Conference with Attorney re: Deposition
 SDS Preparation for Dr. Carter's Deposition
 JEJ Correspondence to Attorney Francuzenko re: Dr. Carter's Deposition Fee
 JEJ Correspondence to Client transmitting Altom and Kirkland Deposition Transcripts
 JEJ Prepare Expert Notebook - Dr. Carter
 JEJ Prepare Expert Notebook - Dr. Gold
 3/20/2012 SDS Review of Correspondence from Attorney and Response
 SDS Conference with Defendant's Attorney
 SDS Appearance at Deposition of Dr. Carter
 SDS Conference with Dr. Carter
 SDS Work on Deposition of Sheriff's Dispatcher
 JEJ Assembled full-sized Transcript of Holway Deposition for Client
 LY Attend Dr. Carter's Deposition
 3/21/2012 SDS Conference with Attorney re: Deposition
 SDS Conference with Attorney re: drafting Objections
 SDS Correspondence to Client
 SDS Correspondence to Attorneys
 SDS Assemble Pleadings, Depositions, and Exhibits for upcoming research projects
 SDS Review of Documents / Review of Exhibits / Research / Deposition Outline / 911 Tape
 LY Conference with Attorney Stone re: Deposition
 JEJ Review of Order and Correspondence to Attorneys re: Trial timelines
 JEJ Transcribe Correspondence to Client re: Transcripts
 JEJ Transcribe Correspondence to Attorneys forwarding all Transcripts
 JEJ Prepare Correspondence to B. Kirkland requesting completion of Deposition Errata Sheet
 JEJ Assemble Exhibits and Transcripts for Motion Prep
 3/22/2012 SDS Deposition of Loudoun County Sheriff's Department Dispatcher Huntley / Conference with Defendant's Attorney
 JEJ Prepare additional litigation materials for Huntley Deposition
 JEJ Updating litigation materials in preparation for Trial
 LY Attend Huntley Deposition
 LY Draft Objections to Defendant's Exhibits
 3/23/2012 SDS Conference with Dr. Carter re: Dr. Gold
 SDS Conference with Paralegal re: Documents to Attorney

*Mr. and Mrs. Marcus Mial**Page 5*

3/23/2012 SDS Telephone Conference with Court Reporter
 JEJ Work on preparation of file materials for motion practice and for Trial
 JEJ Prepare Court Sheet
 JEJ Confirm Court Reporter for Dr. Gold's Deposition
 3/25/2012 SDS Review of Pleadings - Defendant's Objections to Plaintiff's Witnesses / Memorandum to
 Paralegal / Memorandum to Attorney / Analysis
 SDS Develop case themes
 SDS Review of Judge Lee's Trial and Deadline Order
 SDS Review of Pleadings - Defendant's Objections to Plaintiff's Exhibits / Correspondence to Client
 / Analysis
 3/26/2012 SDS Review of Correspondence from Client
 SDS Revisions to Exhibit and Witness Objections
 SDS Conference with Attorney to file Pleadings
 SDS Review of Documents - Articles by Dr. Gold
 SDS Review of Documents from Dr. Carter
 SDS Review of Documents - Expert Reports and Curriculum Vitae filed
 SDS Develop Questions / Revisions for Dr. Gold
 LY Review of Defendant's Objections to Witnesses
 LY Review of Defendant's Objections to Exhibits
 LY Revisions to Plaintiff's Objections to Exhibits
 LY Draft Plaintiff's Objections to Witnesses
 LY Review of Plaintiff's Objections to Exhibits
 LY Review of Plaintiff's Objections to Witnesses
 JEJ Review of Email from Client / Forward to Attorney Stone
 JEJ Research psychiatric articles authored by Dr. Gold
 JEJ Prepare litigation materials for Trial and motion practice
 JEJ Prepare correspondence re: Judge's Order re: Trial Exhibits
 JEJ File Objections to Defendant's Witness and Exhibit Lists with U.S. District Court
 JEJ Telephone Conference with Counsel re: strategy for using litigation materials to oppose
 Defendants' motion
 JEJ Memorandum to Attorney Stone re Documents and Motion issues
 SDS Case Planning Conference re: filings due
 3/27/2012 SDS Deposition of Dr. Gold
 SDS Review of Correspondence from Attorney
 3/28/2012 SDS Research Civil Procedure decisions
 SDS Review of Correspondence from Attorney
 3/29/2012 SDS Review of Correspondence from Expert
 3/30/2012 SDS Review of Pleadings - Defendant's Motion
 SDS Correspondence to Attorney
 SDS Correspondence to Client
 SDS Review of Correspondence from Court Reporter
 SDS Correspondence to Dr. Carter
 SDS Correspondence to Ms. Drake
 SDS Review of notes from Dr. Gold's Deposition

Mr. and Mrs. Marcus Mial

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<i>Summary</i>			
Name	Hours	Rate	Amount
J. Jackson, Paralegal	29.75	125.00	\$3,718.75
Steven David Stone, Esquire	88.25	500.00	\$44,125.00
Luke Young, Esquire	30.25	300.00	\$9,075.00

	<u>Amount</u>
<i>For Professional Services Rendered</i>	\$56,918.75

Costs

Travel	\$88.50
Express Mail and Delivery	\$42.50
Copies and Materials	\$169.30
Total Costs	\$300.30

<i>Total New Charges</i>	\$57,219.05
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<i>Previous Balance</i>	\$539.93
3/13/2012 Payment from Trust Account	(\$539.93)
3/31/2012 Credit fees billed by Paralegal	(\$3,718.75)
3/31/2012 Credit fees billed by Attorney Young	(\$9,075.00)
3/31/2012 Payment from Trust Account	(\$21,555.97)
<i>Please Replenish Client Funds with</i>	\$20,000.00
Balance Due	\$42,869.33

Client Funds Transactions

<i>Previous Balance of Client Funds</i>	\$0.00
3/9/2012 Payment to Trust Account--Check No. 5371	\$5,000.00
3/9/2012 Check No. 1721 to Court Reporter for Transcript of Holway Deposition	(\$1,039.60)
3/13/2012 Payment from Trust Account	(\$539.93)
3/22/2012 Payment to Trust Account--Check No. 5376	\$21,000.00
3/29/2012 Check Nos. 1724-1726 - Dr. Gold's Deposition Fee	(\$2,000.00)
3/30/2012 Check No. 1727 - Attorney Research	(\$650.00)
3/31/2012 Check No. 1728 to Court Reporter (Transcripts--Kirkland Depositions]	(\$214.50)
3/31/2012 Payment from Trust Account	(\$21,555.97)

Mr. and Mrs. Marcus Mial

Page 7

New Balance of Client Funds

Amount

\$0.00

The balance due, if any, may be paid by check or credit card.

Fees billed by Attorney Young and Paralegal have been donated and credited in their entirety, for a total reduction in fees of \$12,793.75.

STEVEN DAVID STONE, P.C.

1004 Prince Street
Alexandria, VA 22314
(703) 684-0200

April 30, 2012

Mr. and Mrs. Marcus Mial
20010 Palmer Classic Parkway
Ashburn, VA 20147

Invoice No. 47062

Re: Lawsuit Against Loudoun County Sheriff's Department -- U.S.
District Court

Professional Services

4/1/2012	SDS	Review of Correspondence from Attorney / Strategic Planning re: Response Brief
	LY	Review of Motion for Summary Judgment and Memorandum of Law
4/2/2012	SDS	Review of Correspondence from Expert
	SDS	Telephone Conference with Defendant's Attorney
	LY	Memorandum to Attorney Stone
	LY	Telephone Conference with Attorney Francuzenko
4/3/2012	SDS	Case Planning
	SDS	Review of Pleadings from Defendant's Attorney
	SDS	Review Recent Court Decisions
	SDS	Telephone Conference with Mr. Mussenden
	SDS	Scheduling
	LY	Review of Correspondence from Attorney
4/4/2012	SDS	Review of Transcript - Huntley Deposition
	SDS	Conference with Paralegal re: Brief documents
	SDS	Review of Correspondence from Attorney
	SDS	Case Planning - Status of Response Brief
	SDS	Trial Planning / Strategic Planning
	JEJ	Prepare litigation materials for Motion
4/5/2012	SDS	Review of Correspondence from Attorney
	SDS	Send Transcripts to Trial Experts
	SDS	Review of Pleadings re: Attorney
	SDS	Review of Documents - Kirkland Acknowledgment
	JEJ	Transcribe Correspondence to Client
	JEJ	Email Correspondence to Attorney
	JEJ	Conference with Attorney Stone
	JEJ	Prepare Case Materials for Experts
	JEJ	Assemble Pleadings, Notebooks, and Correspondence
	LY	Review of Client Documents
	LY	Conference with Paralegal

*Mr. and Mrs. Marcus Mial**Page 2*

4/6/2012 SDS Review of Correspondence from Attorney
 SDS Correspondence to Attorney
 SDS Case Planning - Response Brief
 SDS Scheduling Case Meetings
 JEJ Finalize Kirkland and Golden Errata Sheets
 JEJ Review of Pleadings / Revise file information re: new contact for opposing Counsel
 4/8/2012 SDS Strategic Planning - Response Brief / Review of Defendant's Brief
 4/9/2012 SDS Review of Documents - Dr. Gold Transcript
 SDS Telephone Conferences with Attorney
 SDS Review of Correspondence from Trial planners
 SDS Review of Pleadings - Draft Response Brief
 JEJ Send excerpt of Defendant's Memorandum of Law to Experts
 4/10/2012 SDS Client Message and response
 SDS Review of Documents and Conference with Staff
 SDS Conference with Attorneys re: Response to Defendant's Motion for Summary Judgment
 SDS Conference with Trial Planning Experts
 SDS Discussion with Attorney re: Sayre issue and additional cases
 SDS Strategic Planning - Response Brief re: Contested Facts
 JEJ Complete compilation of Notebooks
 LY Review of Correspondence from Attorney
 LY Conference with Attorney Glasberg and Attorney Stone
 LY Conference with Trial Consultants and Attorney Stone
 4/11/2012 SDS Telephone Conference with Attorney re: Brief
 SDS Review of Correspondence from Court Reporter
 4/12/2012 SDS Conference with Attorney re: Brief
 4/13/2012 SDS Read and revise Response Brief
 JEJ Transcribe Trial Alert to Witnesses
 LY Review of draft Memorandum of Opposition
 LY Conference with Attorney Stone
 4/15/2012 SDS Work on Response Brief
 LY Revisions to Client's Memorandum of Opposition
 4/16/2012 SDS Review of Correspondence and potential Exhibit from Mr. Mussenden
 SDS Correspondence to Mr. Mussenden
 SDS Conference with Attorney and Paralegal re: Hearing Case Notebook
 SDS Read Revised Opposition Brief and Recommendations
 SDS Review of Memorandum from Paralegal
 JEJ Update Deposition Notebooks
 JEJ Assemble voluminous Pleadings
 JEJ Memorandum to Attorney Stone re: Case Pleadings
 JEJ Update misc. file materials
 LY Review of Memorandum of Opposition
 LY Conference with Attorney Stone
 LY Revisions to Memorandum of Opposition
 4/17/2012 SDS Final Revisions to Client's Brief in Opposition to Motion for Summary Judgment
 SDS Review of Correspondence from Attorney
 SDS Review of Correspondence from U.S. District Court

*Mr. and Mrs. Marcus Mial**Page 3*

4/17/2012 JEJ Construct Documents and Index supporting Memorandum of Law / Complete Electronic Court Filing and service on Attorney
 LY Telephone Conference with Attorney
 LY Conference with Paralegal
 LY Revisions to Memorandum of Opposition / Verify Citations
 LY Prepare Exhibits supporting Memorandum of Opposition
 4/18/2012 SDS Conference with Paralegal
 SDS Outline Trial Notebook
 SDS Correspondence to Attorney
 SDS Memorandum to Ms. Meeks
 SDS Review of Correspondence from Mr. Mussenden
 JEJ Preparation of Memorandum of Law Documents for Judge Lee
 JEJ To U.S. District Court to hand deliver copies of Memorandum of Law to Judges' Chambers
 JEJ Set up Notebook for Oral Argument of Memorandum of Law and time-stamped set for Pleadings
 JEJ Begin drafting Index of Authorities and securing case law
 4/19/2012 SDS Review of Correspondence from Mr. Mussenden
 SDS Conference with Paralegal re: Exhibits
 LY Summarize Case Law Research re: Qualified Immunity
 JEJ Continue preparation of Case Law for Oral Argument of Summary Judgment Motion
 JEJ Update file materials
 4/20/2012 SDS Review of Pleadings - Defendant's Response to Plaintiff's Brief
 SDS Direct transmittal to Client
 SDS Review of Correspondence from Attorney
 SDS Conference with Paralegal
 JEJ Further work on preparation of summary of Case Law Notebook
 4/23/2012 JEJ Prepare and send Gold Deposition transcript to Client and Dr. Carter
 JEJ Update Deposition Notebook and Gold Notebook
 JEJ Email to Client re: model of home
 JEJ Prepare and forward case materials to Trial expert
 JEJ Update Summary Judgment Notebook and Index
 JEJ Continue work on construction of Pleadings Notebook
 JEJ Continue Summary of Case Law
 4/24/2012 SDS Review of Correspondence from Client
 SDS Review of Documents
 SDS Research and Review of Cases
 SDS Review of Documents / Conference with Client
 JEJ Continue summarizing Case Law from Fast Case
 4/25/2012 SDS Review of Correspondence from Client
 SDS Review of Correspondence from Mr. Mussenden
 SDS Review of Cases for Court Hearing
 LY Conference with Client and Attorney Stone
 LY Summarize Case Law re: Qualified Immunity
 JEJ Note to Mr. Mussenden re: model of Client's home
 4/26/2012 SDS Review of Correspondence from Expert
 SDS Message to Dr. Carter and Response
 SDS Review of Correspondence from Attorney

Mr. and Mrs. Marcus Mial

Page 4

4/26/2012 SDS Review of Pleadings / Review of Cases, including new cases / Prepare Oral Argument for U.S. District Court
 LY Review of new Research on Qualified Immunity
 LY Memorandum to Attorney Stone
 LY Conference with Paralegal
 JEJ Telephone Conference with Court to confirm Motion on Docket
 JEJ Prepare Court Appearance Sheet
 JEJ Assist with preparation for Oral Argument
 4/27/2012 SDS Court Appearance: U.S. District Court -- Judge Lee / Hearing on Defendant's Motion for Summary Judgment
 LY Court Appearance: Summary Judgment Hearing
 4/29/2012 SDS Case Planning
 4/30/2012 SDS Conference with Client re: Case Planning, Qualified Immunity Hearing, and potential appeals
 LY Conference with Paralegal re: organizing Pleadings

Summary

Name	Hours	Rate	Amount
J. Jackson, Paralegal	47.50	125.00	\$5,937.50
Steven David Stone, Esquire	63.50	500.00	\$31,750.00
Luke Young, Esquire	37.00	300.00	\$11,100.00

*Amount**For Professional Services Rendered*

\$48,787.50

Costs

Travel	\$10.00
Copies and Materials	\$339.80
Postage	\$11.14
Legal Research Fees billed by Attorney	\$25,000.00
Trial Expert--Exhibits	\$1,400.00
Trial Expert--Witness Preparation	\$1,044.50
PACER Fees, U.S. District Court	\$23.20
Private Process Server's Fee	\$93.00

Total Costs

\$27,921.64

Total New Charges

\$76,709.14

Previous Balance

\$22,869.33

4/24/2012 Thank you--Check No. 5398	(\$7,315.00)
4/27/2012 Payment from Trust Account	(\$15,554.33)
4/30/2012 Credit fees billed by Attorney Young	(\$11,100.00)
4/30/2012 Credit fees billed by Paralegal	(\$5,937.50)

Mr. and Mrs. Marcus Mial

Page 5

4/30/2012 Payment from Trust Account	<u>Amount</u>
<i>Please Replenish Client Funds with</i>	(\$929.97)
	<u>\$20,000.00</u>
Balance Due	<u>\$78,741.67</u>

Client Funds Transactions

<i>Previous Balance of Client Funds</i>	\$0.00
4/27/2012 Payment to Trust Account--Check No. 5402	\$20,000.00
4/27/2012 Payment from Trust Account	(\$15,554.33)
4/30/2012 Check Nos. 1731 and 1732 to pay Court Reporters	(\$3,515.70)
4/30/2012 Payment from Trust Account	(\$929.97)
	<u></u>
<i>New Balance of Client Funds</i>	<u>\$0.00</u>

The balance due may be paid by check or credit card.

Fees billed by Attorney Young and Paralegal have been donated and credited in their entirety, for a total reduction in fees of \$17,037.50.

We are in receipt of your check in the amount of \$50,000.00. As you requested, we are holding the check until May 7. When the \$50,000.00 has been deposited and applied, the remaining balance due on this invoice, including trust replenishment, will be \$28,741.67.

STEVEN DAVID STONE, P.C.

1004 Prince Street
Alexandria, VA 22314
(703) 684-0200

May 31, 2012

Mr. and Mrs. Marcus Mial
20010 Palmer Classic Parkway
Ashburn, VA 20147

Invoice No. 47117

Re: Lawsuit Against Loudoun County Sheriff's Department -- U.S.
District Court

Professional Services

5/1/2012	SDS	Review of Pleadings - Judge Lee's Order
	SDS	Correspondence to Client
	SDS	Correspondence to Attorney
	SDS	Correspondence to Experts
	SDS	Strategic Planning re: possible Appeal by Defendants vs. Trial
	SDS	Conference with Process Server
	LY	Review of Pleadings
	JEJ	Review Order re: Summary Judgment and forward to Attorney Stone
	JEJ	Email from Client
	JEJ	Transcribe Correspondence to Client re: outcome of Summary Judgment Hearing
	JEJ	Transcribe Correspondence to Dr. Carter
	JEJ	Transcribe Correspondence to Ms. Drake
	JEJ	Transcribe Correspondence to Mr. Mussenden
	SDS	Transcribe Correspondence to Attorney Glasberg
5/2/2012	JEJ	Construct Trial Notebook and portion of contents
	SDS	Telephone Conference with Ms. Drake
	SDS	Telephone Conference with Mr. Mussenden
5/3/2012	SDS	Review of Correspondence from Attorney
	SDS	Correspondence to Attorney
	JEJ	Telephone Conference with Ms. Drake
	JEJ	Telephone Conference with Mr. Mussenden
5/7/2012	SDS	Review of Correspondence from Attorney
	SDS	Review of Pleadings - Notice from U.S. District Court
	SDS	Case Planning
5/8/2012	JEJ	Work on digest of Huntley Deposition
5/9/2012	SDS	Conference with Staff
	SDS	Scheduling
	SDS	Telephone Conference with Mr. Mussenden
	SDS	Telephone Conference with Defendant Attorney

*Mr. and Mrs. Marcus Mial**Page 2*

5/9/2012 SDS Conference with Staff re: Client issues
 5/10/2012 LY Correspondence to Client (2)
 SDS Scheduling Memorandum
 SDS Memorandum to Attorney re: Client request
 SDS Correspondence to Attorney
 SDS Telephone Conferences with Defendant Attorney
 5/11/2012 SDS Review of Correspondence
 5/14/2012 SDS Telephone Conference with Defendant Attorney re: potential appeal
 5/15/2012 SDS Trial Planning
 5/16/2012 SDS Conference with Staff
 SDS Review of File for Exhibits issues
 SDS Trial Planning Conference with Mr. Mussenden
 JEJ Forward Mussenden information to Attorney Stone
 5/17/2012 SDS Conference with Paralegal
 SDS Case Planning
 5/21/2012 SDS Case Planning Conference
 JEJ Meeting with Attorney Stone
 SPS Deposition Review
 5/22/2012 SDS Case Planning Conference with Attorney and Paralegal re: meetings and research
 SDS Conference with Client
 LY Conference with Attorney Stone
 5/23/2012 SDS Trial Planning - Experts and Trial Team
 SDS Telephone Conference with Mr. Mussenden
 SDS Telephone Conference with Dr. Carter
 SDS Case Planning with Attorney re: Witnesses and F.R.E. Research
 SDS Review of Depositions
 LY Memorandum to Attorney Stone re: Witnesses
 LY Review of Pleadings
 LY Conference with Attorney Stone
 LY Research sovereign immunity and negligence
 LY Conference with Paralegal
 LY Voice Mail Message to Witness Neibich
 LY Telephone Conference with Witness Atkinson
 LY Voice Mail Message to Witness Prebish
 LY Telephone Conference with Witness Slater
 SPS Deposition Review
 5/24/2012 SDS Conference with Attorney re: Review of Recent Court Decisions
 SDS Review of Correspondence from Ms. Drake
 LY Telephone Conference with Witness Prebish
 LY Memorandum to Attorney Stone
 LY Telephone Conference with Witness Neibich
 LY Memorandum to Attorney Stone
 5/25/2012 SDS Telephone Conferences with Ms. Drake
 SDS Conference with Attorney re: Witness Interviews
 SDS Case Planning - Meeting Agenda, Legal Issues
 LY Telephone Conference with Client
 LY Voice Mail Message to Witness Atkinson

*Mr. and Mrs. Marcus Mial**Page 3*

5/25/2012 LY Memorandum to Attorney Stone
 LY Conference with Attorney Stone
 LY Review of Deposition Transcript
 SDS Conference with Dr. Carter
 SDS Conference with Staff re: Scheduling
 SPS Deposition Review
 5/26/2012 LY Review of Deposition Transcripts
 5/28/2012 SDS Research / Case Planning for Conference with Attorneys re: Trial
 SDS Correspondence to Client re: Pre-Trial and Trial work
 LY Draft Client Testimony Outline
 LY Draft T. Mial Testimony Outline
 5/29/2012 SDS Review of Correspondence from Ms. Armand
 SDS Review of Depositions of Experts
 SDS Review of Correspondence from Mr. Mussenden
 SDS Client Message re: Meeting Cancellation
 SDS Memorandum to Ms. Meeks
 SDS Correspondence to Ms. Drake
 SDS Conference with Staff
 SDS Review of Documents - Testimony Outlines / Research
 LY Conference with Attorney Stone and Attorney Glasberg
 LY Review of Correspondence from Attorney Armand
 LY Correspondence to Attorney Armand
 DR Transcription
 SDS Trial Planning Conference with Attorneys
 SDS Review of Correspondence from Ms. Drake
 5/30/2012 SDS Review of Correspondence from Client
 SDS Conference with Staff
 LY Voice Mail Message to Witness Atkinson
 LY Memorandum to Attorney Stone
 DR Transcription
 SPS Deposition Review
 SDS Telephone Conference with Attorney re: Continuance Motion
 SDS Correspondence to Client
 SDS Review of Depositions and Pull Outs
 SDS Review of Documents / Analysis
 5/31/2012 SDS Conference with Ms. Drake
 SDS Conference with Mr. and Ms. Mial
 SDS Conference with Client re: Trial Planning, with Ms. Drake
 LY Conference with Client and Attorney Stone
 JEJ Work on Huntley summary
 SDS Telephone Conference with Attorney
 SDS Conference with Paralegal re: Deposition
 SDS Review of Documents - Analysis of Experts / Trial Planning

Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
J. Jackson, Paralegal	10.75	125.00	\$1,343.75

Mr. and Mrs. Marcus Mial

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Name	Hours	Rate	Amount
Steven David Stone, Esquire	47.33	500.00	\$23,666.67
Luke Young, Esquire	20.25	300.00	\$6,075.00
D. Rivas, Paralegal	1.25	125.00	\$156.25
Legal Assistant	19.00	100.00	\$1,900.00

Amount*For Professional Services Rendered*

\$33,141.67

Costs

Witness Preparation Deposit (Ms. Drake)	\$4,000.00
Exhibit Preparation (Mr. Mussenden)	\$3,000.00
Attorney Research and Drafting	\$5,000.00
Copies and Materials	\$90.20
Travel	\$17.76

Total Costs

\$12,107.96

Total New Charges

\$45,249.63

Previous Balance

\$58,741.67

5/9/2012 Payment from Trust Account	(\$50,000.00)
5/22/2012 Payment from Trust Account	(\$8,741.67)
5/31/2012 Credit all fees billed by Attorney Young	(\$6,075.00)
5/31/2012 Credit all fees billed by J. Jackson, Paralegal	(\$1,343.75)
5/31/2012 Credit all fees billed by D. Rivas, Paralegal	(\$156.25)
5/31/2012 Credit all fees billed by Legal Assistant	(\$1,900.00)
5/31/2012 Payment from Trust Account	(\$11,258.33)

Please Replenish Client Funds with

\$20,000.00

Balance Due**\$44,516.30***Client Funds Transactions*

<i>Previous Balance of Client Funds</i>	\$0.00
5/9/2012 Payment to Trust Account--Check No. 5405	\$50,000.00
5/9/2012 Payment from Trust Account	(\$50,000.00)
5/22/2012 Payment to Trust Account--Check No. 5414	\$20,000.00
5/22/2012 Payment from Trust Account	(\$8,741.67)
5/31/2012 Payment from Trust Account	(\$11,258.33)

Mr. and Mrs. Marcus Mial

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New Balance of Client Funds

Amount

\$0.00

The balance due may be paid by check or credit card. All fees billed by Attorney Young, the Paralegals, and the Legal Assistant have been donated and credited in their entirety, for a total reduction in fees of \$9,475.00.

WESTLAKE

LEGAL GROUP

46175 Westlake Drive, Suite 320

Potomac Falls, Virginia 20165

VA/PA/VA/ Westlakelegal.com

April 7, 2015

Marcus Mial
20010 Palmer Classic Parkway
Ashburn, VA 20147

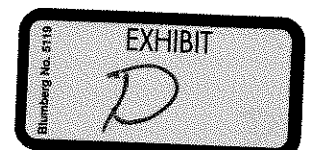
2315- 02

STATEMENT FOR PERIOD THROUGH 4/07/15

LEGAL SERVICES REGARDING Costs

COSTS AND EXPENSES	UNITS	RATE	
5/07/14 Thomas K. Plofchan, Jr. Parking			\$3.00
5/07/14 Thomas K. Plofchan, Jr., Mileage			\$34.43
9/18/14 Thomas K. Plofchan, Jr., parking			\$6.00
9/18/14 Thomas K. Plofchan, Jr., mileage			\$34.43
10/30/14 Service charge billed			\$.61
11/30/14 Service charge billed			\$.62
2/18/15 Thomas K. Plofchan, Jr.			\$9.00
2/13 parking			
2/18/15 Thomas K. Plofchan, Jr.			\$34.43
2/13 mileage			
2/19/15 Lasership, Inc. 1501105740131			\$28.86
3/17/15 Brittany Hyde			\$34.43
Mileage to and from Alexandria			
Eastern District Court to file			
documents			
3/20/15 Thomas K. Plofchan, Jr., Parking			\$17.50
3/20/15 Thomas K. Plofchan, Jr., Mileage			\$34.43
3/25/15 Whitney Lawrimore			\$7.00
Mileage and tolls			
Tolls			
3/25/15 Whitney Lawrimore			\$34.43
Mileage and tolls			
Mileage			
3/27/15 Brittany Hyde			\$35.58
Mileage to and from Eastern			
District Court of VA, with one			
stop to retrieve documents			
3/30/15 Thomas K. Plofchan, Jr.			\$40.00
Parking Tues, Wed, Thurs, Fri			
3/30/15 Whitney Lawrimore			\$10.00
Mileage tolls and parking EDVA.			
Parking			
3/30/15 Whitney Lawrimore			\$8.75
Mileage tolls and parking EDVA.			
Tolls			

♦ We accept MasterCard, Visa, American Express and Discover ♦



3/30/15 Thomas K. Plofchan, Jr.	\$137.72
Mileage Tues, Wed, Thurs, Fri	
3/30/15 Whitney Lawrimore	\$34.43
Mileage tolls and parking EDVA.	
Mileage	
3/31/15 Service charge billed	\$.45
TOTAL COSTS AND EXPENSES	\$546.10



EDWIN N. CARTER, PH.D.

Clinical Psychologist

8134 Old Keene Mill Road, Suite 101
Springfield, VA 22152
Telephone: 703-569-8731
Fax: 703-569-7248

8348 Traford Lane, Suite 102
Springfield, VA 22152
Telephone: 703-569-8731
Fax: 703-854-1144

8802 Sudley Road, Suite 112
Manassas, VA 20110
Telephone: 703-569-8731
Fax: 703-569-7248

February 7, 2012

Cost Summary

Re: Marcus Mial

Preparation and Anticipated Testimony	15 units	\$	3,150.00
---------------------------------------	----------	----	----------

*Individual, Family & Group Therapy - Alcohol & Chemical Dependency Problems - Diagnostic Assessments
Neuropsychological, Psychological, Educational, Vocational & Diagnostic Evaluation & Counseling*



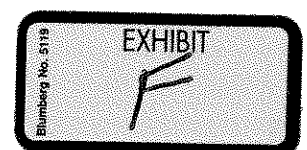
EXPENSES FOR TRIAL OF MARCUS MIAL v JENNIFER SHERIN ET AL
23-25 MARCH 2015

HOLIDAY INN & SUITES, 625 FIRST STREET, ALEXANDRIA: \$585.02
23 & 24 MARCH 2015

YELLOW CAB TO AND FROM COURTHOUSE SQUARE, ALEXANDRIA: \$ 23.00
24 MARCH 2015

LUNCH AT COURTHOUSE 24 MARCH: \$15.75
24 MARCH 2015

MILAGE WARRENTON - ALEXANDRIA & RETURN: 104 MI. @ 13.5c : \$14.04
TOTAL: \$637.81



BAKER SIMMONS
Attorneys at Law
2120 L Street, NW, Suite 200
Washington, DC 20037
Tel: 202.775.0050 Facsimile: 202.775.0056

Statement for Professional Services Rendered

October 3, 2011

Mr. Marcus Mial
[REDACTED]
[REDACTED]

RE: Legal Consultation

Professional Services:

02/01/11	Read, review and analyze court pleadings, transcripts and other documents re underlying action; etc.;	FLAT	\$400.00
02/03/11	In house conference w/client; notes to file re same;	1.00 \$300.00/hr	\$300.00

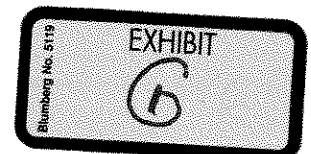
Total Services Rendered
Payment

\$700.00
(\$400.00)

TOTAL AMOUNT DUE UPON RECEIPT.

\$300.00

2016



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MARCUS MIAL,)	
)	
Plaintiff,)	
)	
v.)	1:11-cv-921
)	
JENNIFER A. SHERIN, <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF PETER T. ENSLEIN, ESQ.

I, the undersigned, do solemnly declare and state that:

1. I represented the Plaintiff in his interlocutory appeal relating to the above-styled case.
2. Attorney's fees and costs are billed in accordance with the agreement with the client.
3. The fees and costs in this matter were based on a flat fee representation of \$15,000.00.
4. The amount charged and hours spent were based, in part, on the complexity of the legal issues encountered and the time needed to prepare.
5. The amount billed was necessary and appropriate.
6. The fees incurred were fees less than ordinarily charged in similar civil rights cases in the Washington metropolitan area.
7. My total fee for services rendered to Mr. Mial in the appeal was \$15,000.00.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: April 9, 2015


Peter T. Enslein




MARCUS S MIAL OR 02-05
THERESA P MIAL
20010 PALMER CLASSIC PKWY 703-858-3485
ASHBURN, VA 20147-6203

5457

65-7198/2550

8/31/2012
Date

PAY to the Order of PETER T. HANSEN PC. \$ 15,000.
FIFTEEN THOUSAND AND NO/100 Dollars  Security Features Details on back.

Capital One Bank

Capital One, N.A.
FOR ASTORIA

THOMAS D. MYRUD

⑆255071981⑆114 32 84267⑈ 05457

MSRND CTRV

COLONIAL CLASSIC®

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DEPOSIT TICKET

0110

DATE

9/4/12

	DOLLARS	CENTS
CURRENCY		
COINS		
CHECKS LIST EACH SEPARATELY		
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TOTAL BACKSIDE OR ATTACHED LIST		
PLEASE RE-ENTER TOTAL HERE	TOTAL	15,000 00
USE OTHER SIDE FOR ADDITIONAL LISTING PLEASE BE SURE ALL ITEMS ARE PROPERLY ENDORSED.		

LAW OFFICES OF PETER T. ENSLEIN
IOLTA ACCOUNT
1738 WISCONSIN AVE. NW
WASHINGTON, DC 20007-2313



\$

15000.00

⑆6400⑈4020⑆ 5300783783⑈

Mial Refainer

TOTAL
ITEMS

1

CHECKS AND OTHER ITEMS
ARE RETURNED FOR DEPOSIT
SLIP TO THE PROVISIONS
OF THE UNIFORM COMMERCIAL
CODE CONF ON ANY APPLICABLE
BILL COLLECTION AGREEMENT
DEPOSITS MAY NOT BE AVAILABLE
FOR IMMEDIATE WITHDRAWAL

15-3/540
527

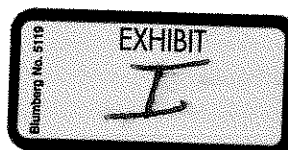
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CLIENT TIME HISTORY

PAGE 1

FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
2315 Mial, Marcus	01 Civil rights case	TKP	3/11/14	.50	.00	200.00	Consult			
		TKP	3/13/14	.50	.00	200.00	Review of US District Court Memorandum			
		TKP	3/31/14	2.00	.00	800.00	Review of documents			
		WL	4/11/14	.25	.00	62.50	Call court for additional information regarding upcoming court date.			
		ML	4/23/14	.25	.00	35.00	Follow up call with client on status of his obtaining file from previous attorney			
		WL	4/25/14	2.25	.00	562.50	Review binder and outline facts regarding complaints and answers; Draft discovery plan; schedule upcoming deadlines.			
		TKP	4/28/14	1.00	.00	400.00	Review of files			
		WL	4/28/14	2.50	.00	625.00	Review binders; discuss with TKP; amend discovery plan.			
		WL	4/29/14	.25	.00	62.50	Final amendments and edits to discovery plan.			
		WL	4/30/14	1.00	.00	250.00	Finalize discovery plan; draft notice of appearance; file on ECF; organize hard copies; prepare for hard copy service on opposing counsel; e-mail update to opposing counsel.			
		ML	5/01/14	.25	.00	35.00	Mail brief to opposing counsel			
		TKP	5/07/14	2.50	.00	1,000.00	Court for hearing on discovery			
		DG	5/21/14	1.00	.00	325.00	L120 A104			
		DG	5/27/14	.75	.00	243.75	L440 A104			
		ML	5/27/14	.25	.00	35.00	Download Discovery Plan from Pacer			
		DG	5/28/14	1.50	.00	487.50	L130 A104 review documents to determine need for further experts			
		DG	5/29/14	.25	.00	81.25	Discuss disclosure deadline with ML			
		DG	5/29/14	.50	.00	162.50	Discuss need for further expert with TKP			
		ML	6/17/14	.25	.00	35.00	Mail expert designation to opposing counsel; calendar dates			
		WL	6/17/14	1.50	.00	375.00	Pull scheduling order from pacer; review deadlines and have ML calendar them with			



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CLIENT TIME HISTORY

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FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK ACT. DATE	BILL DATE	BILL AMOUNT
							reminders; discuss expert designation with TKP; draft notice regarding expert designation; call opposing counsel to discuss designation; pull original designation; file with court and prep for service on opposing counsel.		
		WL	6/20/14	2.75	.00	687.50			
							Review discovery requests and responses; compile thoughts for additional discovery requests.		
		WL	6/24/14	1.00	.00	250.00			
							Prepare discovery requests and draft letter to opposing counsel; final review of discovery received to ensure missing discovery responses not overlooked.		
		DG	6/25/14	.25	.00	81.25			
		ML	6/26/14	.25	.00	35.00			
							Review interrogatories for WL		
							Proof read letter to Opposing Counsel; confirm opposing counsel address; proof read Second Interrogatories; print letter and rogs		
		WL	7/15/14	.25	.00	62.50			
							Review status and advise ML of current status and next steps.		
		WL	7/18/14	.50	.00	125.00			
							Pull file; look for discovery responses; telephone discussion with client.		
		ML	7/23/14	.25	.00	35.00			
							Call to opposing counsel's office regarding discovery; draft fax cover to opposing counsel regarding discovery; fax		
		WL	7/29/14	.25	.00	62.50			
							Call to expert to confirm availability to testify as expert witness.		
		ML	7/31/14	.25	.00	35.00			
							Scan Notice and efile; mail copy to opposing counsel		
		WL	7/31/14	.25	.00	62.50			
							Telephone discussion with Dr. Carter's office; call to client; e-mail to client regarding meeting with Dr. Carter.		
		WL	8/01/14	1.25	.00	312.50			
							Meeting with client; draft letter to dr's office regarding billing.		
		JMG	8/04/14	.25	.00	68.75			
							review letter to client regarding damages expectations		
		WL	8/04/14	.25	.00	62.50			
							Correspondence with client; draft damages letter to client.		
		WL	8/05/14	.25	.00	62.50			
							Correspondence with opposing counsel and client regarding discovery responses to be submitted next week.		

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CLIENT TIME HISTORY

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FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
		WL	8/06/14	.25	.00	62.50	Correspondence with client regarding preparation DVD; discuss with BH.			
		WL	8/08/14	.75	.00	187.50	Review depo information.			
		WL	8/14/14	.25	.00	62.50	Email client regarding meeting with children regarding their possible testimony.			
		WL	8/18/14	.25	.00	62.50	Review letter from Dr. Carter; e-mail letter to client.			
		WL	8/19/14	.25	.00	62.50	Email correspondence with client regarding expert witness options.			
		BH	8/21/14	.25	.00	21.25	Scanned documents to e-mail to client; e-mailed documents to client			
		WL	8/21/14	2.00	.00	500.00	Meeting with clients and his children to assess children's ability to testify as witnesses; discuss children's testimony with TKP; draft letter to client; review discovery responses and schedule reminders for next steps.			
		BH	8/29/14	1.00	.00	85.00	Prepared Draft of Rule 26(a)(3) Witness and Exhibit Disclosures			
		WL	9/02/14	1.25	.00	312.50	Review disclosure information; amend as needed; draft stipulation of facts; e-mail to client; schedule follow up.			
		VM	9/03/14	.25	.00	35.00	left follow up message with client			
		TKP	9/04/14	1.50	.00	600.00	Review of exhibits and witness lists. Further preparation of exhibit lists.			
		WL	9/04/14	1.00	.00	250.00	Correspondence with client; review documents included in exhibit list; respond to client's e-mail with follow up questions; discuss documents with TKP.			
		WL	9/05/14	.50	.00	125.00	Review of documents; correspondence with client regarding exhibits.			
		WL	9/08/14	.25	.00	62.50	Review deposition diagrams.			
		ML	9/11/14	.25	.00	35.00	Calls with client regarding Dr. Carter			
		ML	9/15/14	.25	.00	35.00	Follow up call to client regarding Dr. Carter's dates			
		ML	9/16/14	.25	.00	35.00	Leave voice message for Dr. Carter regarding his available dates			

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CLIENT TIME HISTORY

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CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
		ML	9/17/14	.25	.00	35.00	Follow up call to Dr. Carter's office for his available dates			
		TKP	9/17/14	1.00	.00	400.00	Review documents prior to scheduling conference			
		WL	9/17/14	1.00	.00	250.00	Discussion with TKP and amendments to documents for filing.			
		TKP	9/18/14	3.75	.00	1,500.00	Travel to Alexandria, conduct scheduling conference, return			
		WL	9/18/14	1.50	.00	375.00	Delegation meeting with BH regarding expense spreadsheet; discuss case strategy with TKP; call client, court, and opposing counsel regarding trial date; conference call; call and e-mail client. review binders for previous trial order and objections; note approximate deadlines for jury instructions and next steps.			
		ML	9/19/14	1.00	.00	140.00	Transcribe Objections to Witnesses and Objections to Exhibits			
		WL	9/19/14	.50	.00	125.00	Dictate objections to exhibits and witnesses; begin shell of motion in limine.			
		BH	9/23/14	1.00	.00	85.00	Reviewed exhibits for trial; created spreadsheet of claimed damages			
		WL	9/23/14	.25	.00	62.50	Answer questions for BH and review documents to determine expenses.			
		ML	9/25/14	.50	.00	70.00	Go online for pre-trial schedule order; enter deadlines on calendar			
		WL	9/25/14	.25	.00	62.50	Discuss deadlines with ML.			
		WL	9/26/14	1.50	.00	375.00	Review witness and exhibit lists from opposing counsel; look for deposition of Jennifer Huntley; discuss witnesses with client; review exhibits and note objections.			
		TKP	9/29/14	.75	.00	300.00	Review of objections to witnesses and exhibits referencing the Federal Rules of Evidence			
		WL	9/29/14	1.75	.00	437.50	Discuss objections with TKP; review deposition of Theresa Mial; review FRCP regarding objections and 911 tape; amend objections; file objections with court electronically.			

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CLIENT TIME HISTORY

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CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
		WL	10/16/14	2.00	.00	530.00	Research similar awards.			
		WL	10/17/14	.25	.00	66.25	Review status of deadlines; draft letter to send to client with judgment and settlement amounts.			
		WL	10/24/14	.25	.00	66.25	Discuss with TKP and finalize letter to client.			
		WL	10/31/14	.25	.00	66.25	Pull file and return client's call, left voice mail.			
		WL	11/21/14	2.00	.00	530.00	Meeting with client to discuss CPS letter, witnesses, facts, and strategy.			
		WL	11/25/14	.25	.00	66.25	Email correspondence with client regarding wife's contributions.			
		WL	12/09/14	1.00	.00	265.00	Review voicemail from client twice (client didn't leave name had to listen again for telephone number); called client and left message; telephone discussion with client regarding charge and facts; prepare representation agreement and note next steps.			
		WL	12/19/14	1.25	.00	331.25	Review file and look for transcript of motion for summary judgment; review determination in motion for summary judgment; review file for motion in limine; compile issues for potential motion in limine.			
		TKP	12/23/14	.25	.00	125.00	Call with opposing counsel. They have offered \$25,000 to settle.			
		WL	1/08/15	.50	.00	132.50	Review file regarding motion for summary judgment.			
		WL	1/12/15	5.25	.00	1,391.25	Review opposing counsel's expert's report; review transcripts of Marcus and Theresa Mial; research caselaw for motion in limine; draft motion in limine.			
		LKC	1/13/15	.50	.00	125.00	review mil			
		WL	1/13/15	.25	.00	66.25	Amend motion in limine.			
		DG	1/14/15	.50	.00	162.50	Edit/feedback on MIL			
		TKP	1/14/15	.50	.00	250.00	Review motion in limine			
		TKP	1/14/15	.50	.00	250.00	Call with client and follow up with WLH and JDG			

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CLIENT TIME HISTORY

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FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
		WL	1/14/15	.25	.00	66.25	Correspondence with TKP regarding motion in limine.			
		WL	1/14/15	2.00	.00	530.00	Amend motion in limine; telephone discussion with client; discussion with TKP and DG; research issues; review depositions/reports.			
		LKC	1/15/15	1.00	.00	250.00	review mil			
		ML	1/15/15	.50	.00	70.00	Proof read Motion in Limine; revisions to motion; confirm court open on Friday and rules for courtesy copy to chambers			
		TKP	1/15/15	1.00	.00	500.00	Review letter from client; discussion with WLH regarding it			
		WL	1/15/15	1.50	.00	397.50	Review e-mail from client; amend motion in limine; research Dr. Gold testimony issue; discuss with TKP and LKC; final amendments; file;			
		ML	1/16/15	.25	.00	35.00	Call to courier for package to chambers			
		ML	1/16/15	.50	.00	70.00	Draft Notice of Hearing; revisions; file electronically			
		WL	1/16/15	.25	.00	66.25	Draft letter to client.			
		WL	1/21/15	.50	.00	132.50	Pull case information and review FRCP regarding nonsuits; discussion with TKP.			
		WL	1/26/15	.25	.00	66.25	Draft letter to client regarding Dr. Carter not responding to messages.			
		WL	1/27/15	2.25	.00	596.25	Telephone discussion with client regarding response to motion in limine and updates; review file regarding witnesses; draft response to motion in limine.			
		JMG	1/28/15	.50	.00	137.50	review response in opposition of defendants' motion in limine			
		ML	1/28/15	.25	.00	35.00	Draft letter to Dr. Carter			
		WL	1/28/15	1.00	.00	265.00	Finalize response to Defendants' motion in limine; e-mail to client for his records.			
		BH	1/29/15	.50	.00	42.50	Searched and printed case law; copied and highlighted cases in preparation for trial binders			
		WL	2/10/15	1.00	.00	265.00	Review documents; e-mail to clerk; research police records/business records.			

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CLIENT TIME HISTORY

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FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
		TKP	2/12/15	1.50	.00	750.00	Review of pleadings and prepare for motions in limine			
		WL	2/12/15	2.25	.00	596.25	Telephone discussion with client; review correspondence to Dr. Carter; call Dr. Carter's office; create memo of update; discussion with TKP regarding strategy and preparation for motion; copy answers and compile items for court.			
		TKP	2/13/15	4.00	.00	2,000.00	Court for Motions in Limine and scheduling mediation			
		VM	2/13/15	.25	.00	35.00	called court			
		WL	2/13/15	2.25	.00	596.25	Telephone discussion with TKP; e-mail update to client; telephone discussion with Glasberg; lm for Stone; call and e-mail Dunn; research SOL issue; telephone discussion with Dunn regarding scheduling mediation.			
		WL	2/17/15	.25	.00	66.25	Contact opposing counsel to follow up on scheduling a mediation conference.			
		ML	2/18/15	.25	.00	35.00	Call with Dunn regarding scheduling mediation			
		ML	2/19/15	.25	.00	35.00	Call from Judge Davis's clerk			
		WL	2/19/15	.50	.00	132.50	Meeting with TKP to discuss mediation.			
		ML	2/20/15	.25	.00	35.00	Call to Judge Davis' clerk regarding scheduling mediation; forward notice to client			
		WL	2/20/15	2.00	.00	530.00	Telephone Stone's office; update notes; telephone Dr. Carter's office and left messages with receptionist and Dr. Carter's assistant; e-mail update to client; work with TKP and ML to schedule mediation; telephone discussion with Dunn; conference call with Dunn and court x3.			
		WL	2/23/15	.75	.00	198.75	Call Dunn regarding settlement conference; call chambers regarding settlement conference; conference call with Dunn and chambers; conference call with Lee's chambers; conference call with Davis' chambers; e-mail update to client.			
		WL	2/24/15	1.00	.00	265.00	Discussion with TKP regarding case; telephone discussion with Debra Goldenberg; e-mail client regarding wife's address.			

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CLIENT TIME HISTORY

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FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
		WL	2/26/15	1.00	.00	265.00	Pull order; update and organize witness and exhibit lists for both sides; draft letter to opposing counsel; e-mail client regarding wife's address and meeting with Dr. Carter; draft outline of letter to client.			
		WL	2/27/15	.75	.00	198.75	Telephone discussion with Dr. Carter's office regarding re-scheduling conference call; telephone discussion with client; scan and e-mail documents to attorney per client's request.			
		ML	3/02/15	.75	.00	105.00	Call to client for 2 witness addresses; prepare multiple witness subpoenas			
		ML	3/03/15	.25	.00	35.00	Prepare 11 witness subpoenas for process server			
		TKP	3/03/15	.50	.00	250.00	Review summary judgment denial for discussion on facts for trial			
		WL	3/03/15	3.50	.00	927.50	Review and organize documents for file; finalize subpoenas; discuss motion with tkp; begin drafting jury instructions; draft voir dire; draft letter to judge regarding laptop.			
		ML	3/04/15	.25	.00	35.00	Confirm deadline reminders in calendar			
		VM	3/04/15	.25	.00	35.00	OCR jury instruction			
		WL	3/04/15	.50	.00	132.50	Call Dr. Carter and lm; update and review jury instructions; discuss witness subpoenas with ML.			
		TKP	3/05/15	1.00	.00	500.00	Review of proposed jury instructions and voir dire. Review of taser manual and of exhibits of standing orders			
		WL	3/05/15	1.25	.00	331.25	Review materials with TKP; call Dr. Carter;			
		ML	3/09/15	.50	.00	70.00	Call to client for updated contact info for Neibich; call to process server Neibich now in Florida; create Exhibit divider tabs; call to Stone's office leaving vm for unredacted copy of General Order 534			
		WL	3/09/15	7.00	.00	1,855.00	Telephone discussion with Slater; discuss witness subpoena service with ML; update exhibit list; review exhibits and prepare for filing; look for unredacted order; organize witness notes; organize depositions; pull orders; file correspondence; review			

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CLIENT TIME HISTORY

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FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
							correspondence from Carter and draft letter to client.			
		WL	3/10/15	2.50	.00	662.50				
							Research issue regarding costs; research case law regarding general orders; amend voir dire; amend jury instructions; amend verdict form; e-mail correspondence with TKP.			
		ML	3/11/15	.25	.00	35.00				
							Call to INOVA Hospital regarding affidavits (left voice message); call to client regarding Virginia Heart; email to client for Troy's phone number			
		WL	3/11/15	6.00	.00	1,590.00				
							Telephone discussion with Bud Kirkland; telephone discussion with Carolyn Kirkland; call Atkinson and e-mail; call Dr. Venes, call Dr. Valentini; organize depositions; look into FRCP regarding depositions; review and notate Carter depo; draft trial questions; prepare letter to send to client.			
		DG	3/12/15	.25	.00	81.25				
							Discuss JIs and voir dire with WLH			
		ML	3/12/15	.25	.00	35.00				
							Follow up call to Josh at Internal Medicine of Reston regarding affidavits			
		WL	3/12/15	1.75	.00	463.75				
							Work on jury instructions.			
		DG	3/13/15	6.00	.00	1,950.00				
							Work on JIs and voir dire			
		WL	3/13/15	5.25	.00	1,391.25				
							Review transcripts of Mr. and Mrs. Kirkland; telephone discussion with witness Atkinson; amend jury instructions; draft objections; draft response to motion in limine; telephone discussion with TKP;			
		BH	3/16/15	3.50	.00	297.50				
							Travel time to Alexandria Federal Court and back; began duplicating trial binders			
		DG	3/16/15	2.50	.00	812.50				
							Assist with voir dire and JIs			
		LKC	3/16/15	.50	.00	125.00				
							review opposition to motion in limine			
		ML	3/16/15	2.00	.00	280.00				
							Print letter to judge; revisions and numbering of jury instructions; call to Chambers regarding faxing letter to judge; fax to chambers; draft Motion to Use Electronic Equipment in Trial; scan and e-file Motion, Agreed Jury Instructions, Plaintiff's Jury Instructions and Verdict Form			
		WL	3/16/15	8.25	.00	2,186.25				
							Finalize jury instructions; research and amend motion in limine response; amend			

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CLIENT TIME HISTORY

PAGE 10

FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
							objection to jury instructions; correspondence with court regarding filing; correspondence with opposing counsel regarding motions and jury instructions; brief discussion with TKP.			
		BH	3/17/15	.50	.00	42.50				
		ML	3/17/15	1.50	.00	210.00	Continued copying trial binders			
							Call to client to schedule trial prep meeting; scan and efile 4 filings; arrange for courier; return call from Dr. Valenti's office regarding affidavit; draft affidavit for Dr. Valenti; scan and email to his office; emails back and forth with Dr. Valenti's office; finalize Exhibit-Witness List, scan and e-fil			
		WL	3/17/15	8.00	.00	2,120.00				
							Review and prepare for trial regarding witness testimony; correspondence with court; prepare filing for chambers; finalize exhibit and witness list; update binder; draft proposed order;			
		BH	3/18/15	5.75	.00	488.75				
							Printed case law for trial; created trial binders and copied all exhibits; typed up testimony outlines for witnesses			
		ML	3/18/15	.75	.00	105.00				
							Draft Praecipe to file process server affidavits; scan and efile; calls and emails with Dr. Valenti's office; call to client to pick up medical records; print/fax/mail letter to Francuzenku; scan and efile 3 objections			
		TKP	3/18/15	1.00	.00	500.00				
							Call with Dr. Carter and evaluation of whether to call him as a witness			
		WL	3/18/15	4.25	.00	1,126.25				
							Discussion with Carter; final prep for witnesses; discussion with TKP; pull cases for inclusion in binders; final edits to objection to exhibits, response to motion in limine; correspondence with opposing counsel regarding jury instructions and agreed order regarding electronics; read and highlight cases.			
		BH	3/19/15	.50	.00	42.50				
							Highlighted judge's copies of case law for trial			
		ML	3/19/15	1.00	.00	140.00				
							Call to Slater; draft letter to Slater; email to Valenti; calls to client; misc copying			
		TKP	3/19/15	5.00	.00	2,500.00				
							Meet with client to go over trial prep			
		WL	3/19/15	6.50	.00	1,722.50				
							Meeting with client; draft motion in limine; draft letter to carter; draft			

TR8523 4/08/15
W1 13:32:52

CLIENT TIME HISTORY

PAGE 11

FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
		BH	3/20/15	2.50	.00	212.50	discovery responses.			
							Created additional trial binders; updated and added exhibits to all existing binders			
		ML	3/20/15	2.00	.00	280.00	Call to Dr. Vives to release him; draft letter to Vives regarding same and scan and email; scan and e-file Amended Exhibit List; scan and e-file Motion in Limine and Memo in Support; draft Praecipe and scan and e-file process server's Affidavit on Che Rogers; fax/mail supplemental interrogatory response; scan and e-file Certificate of Discovery; call to client; call to courier service for package to Chambers and opposing counsel			
		VM	3/20/15	2.00	.00	280.00	prepare trial binders			
		WL	3/20/15	4.50	.00	1,192.50	Finalize binders; create damages list; review invoices from client; create list; update rog responses; e-mail client regarding rogs; e-mail Carter documents to client; review Glasberg invoices; update rogs.			
		TKP	3/22/15	13.00	.00	6,500.00	Prepare for trial; review all the testimony			
		WL	3/22/15	5.50	.00	1,457.50	Trial prep with TKP.			
		DG	3/23/15	.75	.00	243.75	Research for Tom; Discuss results			
		ML	3/23/15	.50	.00	70.00	Re-fax our Supplemental Interrogatory Answers to opposing counsel; go on ecf and print out Order regarding electronics in courtroom; calls with Dr. Valenti's office			
		TKP	3/23/15	14.00	.00	7,000.00	Travel to court and conduct first day of trial and return			
		WL	3/23/15	11.00	.00	2,915.00	Travel and trial.			
		WL	3/23/15	2.75	.00	728.75	Trial prep.			
		ML	3/24/15	.25	.00	35.00	Calls and email to Dr. Carter			
		TKP	3/24/15	12.00	.00	6,000.00	Second day of trial			
		WL	3/24/15	11.00	.00	2,915.00	Travel and court appearance for day 2 of jury trial.			
		BH	3/25/15	3.00	.00	255.00	Drove to TKP's house to retrieve left documents; drove documents to Alexandria federal court; called Dr. Carter and			

TR8523 4/08/15
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CLIENT TIME HISTORY

PAGE 12

FROM 3/11/14 THRU 4/07/15

CLIENT/ MATTER	N A M E / DESCRIPTION	T.K.	DATE	HOURS	VALUE AT RATE	VALUE AT STANDARD	TASK	ACT.	BILL DATE	BILL AMOUNT
							spoke with assistant regarding testimony			
		TKP	3/25/15	12.00	.00	6,000.00	Third day of trial			
		VM	3/25/15	.25	.00	35.00	locate files			
		WL	3/25/15	11.50	.00	3,047.50	Travel and court appearance for day 3 of trial.			
		TKP	3/26/15	12.00	.00	6,000.00	Fourth day of trial			
		WL	3/26/15	12.50	.00	3,312.50	Travel and court appearance; day 4 of trial.			
		ML	3/27/15	.25	.00	35.00	Format and print jury instructions and closing argument per emails from TKP			
		TKP	3/27/15	12.00	.00	6,000.00	Fifth day of trial			
		WL	3/27/15	1.00	.00	265.00	Review and amend jury instructions; research for instructions;			
		WL	3/27/15	7.50	.00	1,987.50	Travel and court appearance for day 5 of jury trial.			
		ML	3/30/15	.25	.00	35.00	Begin shell for press release			
		WL	3/30/15	9.00	.00	2,385.00	Travel and court appearance for jury deliberations; discussion with tkp.			
		ML	3/31/15	3.00	.00	420.00	Draft press release; multiple revisions to press release; search internet for contacts to send press release; scan and email press release			
		ML	4/01/15	1.00	.00	140.00	search for more contacts and email press release; emails with VA Lawyers Weekly			
		WL	4/02/15	.25	.00	66.25	E-mail client to follow up on documents for motion for attorney fees and costs.			
		WL	4/06/15	1.75	.00	463.75	Review article and comments; draft response; begin drafting motion for attorney's fees; research authority and support;			
		WL	4/07/15	2.25	.00	596.25	Research reasonable fees; create costs spreadsheet; update motion;			
MATTER TOTAL				359.75	.00	112,416.25				
FIRM TOTAL				359.75	.00	112,416.25				

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

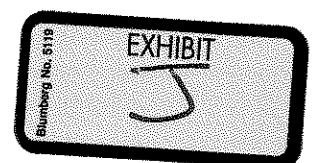
MARCUS MIAL,)	
)	
Plaintiff,)	
)	
v.)	1:11-cv-921
)	
JENNIFER A. SHERIN, <i>et al.</i> ,)	
)	
Defendants.)	

AFFIDAVIT OF ATTORNEY FEES

COMMONWEALTH OF VIRGINIA
COUNTY OF LOUDOUN, to wit:

I, the undersigned, do solemnly swear that:

1. I am counsel for the Plaintiff in the above-styled case.
2. Attorneys fees are billed in accordance with a written contract with the client.
3. The written contract identifies the class of attorney as being partner or associate and the hourly billing rates that would be charged by each attorney.
4. The attorneys' fees were charged with respect to representation in the above styled matter.
5. The attorneys' fees and hours spent were based on the complexity of the legal issues encountered and the time needed to prepare for trial or motions, to include a five day jury trial and deliberations.
6. The attorneys fees billed were necessary and appropriate.
7. The time was billed accurately and the hours charged were reasonable.



8. The fees incurred were fees ordinarily charged in similar civil rights cases in the Northern Virginia area.

9. I am lead counsel in Mr. Mial's case. I am the principal of Westlake Legal Group and was admitted to the Virginia State Bar in 1992. In my nearly twenty-three years of practice, I have litigated hundreds of trials, most of which were jury trials. Although I am a general practice litigator, I have significant experience litigating civil cases, including civil rights, wrongful death, personal injury, government contracts, and malpractice claims. I have represented clients and attained multi-million dollar jury verdicts on numerous occasions. Several of the cases of which I have been involved have published opinions. See e.g. Wright v. Minnicks, 275 Va. 579 (2008), Vasquez v. Mabini, 269 Va. 155 (2005), Smith v. McLaughlin, 214 Va. LEXIS 127 (2014), and Shilling v. Jiminez, 268 Va. 202 (2004).

10. Lavanya Carrithers, Jennifer M. Guida, and Whitney Lawrimore Hughes are all associate attorneys with Westlake Legal Group. Each was admitted to the Virginia State Bar in 2011 and has handled several civil litigation cases during her career. Whitney Lawrimore Hughes has acted as second-chair in this matter and has performed significant work to prepare the matter for trial.

11. J. Daniel Griffith is an associate attorney with Westlake Legal Group and was admitted to the Virginia State Bar in 2007. Prior to joining the Westlake Legal Group, he practiced as a Loudoun County Public Defender where he handled countless criminal matters, taking several of the cases to jury trial. Mr. Griffith added significant insight to the case with his background and experience with criminal law and the responsibilities of the defendants.

13. Victoria Mercer has approximately six years legal experience both working in law firms and working as a clerk in the Loudoun County General District Court.

14. Melinda Logan has over twenty-five years experience as a paralegal/legal assistant.

15. Brittany Hyde has approximately one year of experience as a legal assistant.

16. While this matter was charged on a contingency basis, the attorneys' fees and paralegal fees incurred at each person's hourly rate are as follows, to date:

A. Thomas K. Plofchan, Jr.: 103.75 Total Hours at Standard Hourly Rate @ 500.00 for a total of \$51,875.00.

B. Lavanya Carrithers: 2.00 Total Hours at Standard Hourly Rate @ \$250.00 for a total of \$500.00.

C. J. Daniel Griffith: 14.25 Total Hours at Standard Hourly Rate @ 325.00 for a total of \$4,631.25.

D. Jennifer M. Guida: .75 Total Hours at Standard Hourly Rate @ 275.00 for a total of \$206.25

E. Whitney Lawrimore Hughes: 196.25 Total Hours at Standard Hourly Rate @ 265.00 for a total of \$52,006.25.

F. Paralegal- Victoria Mercer: 3.00 Total Hours at Standard Hourly Rate @ 140.00 for a total of \$420.00.

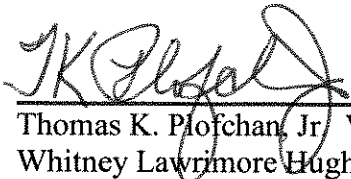
G. Paralegal- Melinda Logan: 21.25 Total Hours at Standard Hourly Rate @ \$140.00 for a total of \$2,975.00.

H. Legal Assistant- Brittany Hyde: 18.50 Total Hours at Standard
Hourly Rate @ 85.00 for a total of \$1,572.50.

Total for Services: \$114,186.25

Respectfully submitted,

MARCUS S. MIAL



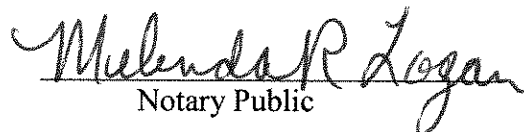
Thomas K. Plofchan, Jr. VSB 34536
Whitney Lawrimore Hughes VSB 82331
Counsel for Plaintiff
Westlake Legal Group
46175 Westlake Drive, Suite 320
Potomac Falls, Virginia 20165
Telephone 703-406-7616
Facsimile 703-434-3510
tplofchan@westlakelegal.com
wlawrimore@westlakelegal.com

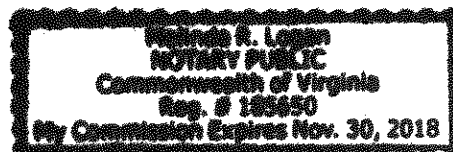
COMMONWEALTH OF VIRGINIA
County of Loudoun, to-wit;

Before me, the undersigned Notary Public, in and for the above-mentioned jurisdiction, appeared this day Thomas K. Plofchan, Jr., whose name is signed to the foregoing document, and acknowledged his signature thereto.

Subscribed and sworn to before me this 9 day of April, 2015.

My Commission Expires: Nov 30, 2018


Notary Public



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

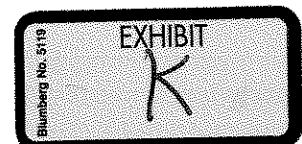
MARCUS MIAL,)	
)	
Plaintiff,)	
)	
v.)	1:11-cv-921
)	
JENNIFER A. SHERIN, <i>et al.</i> ,)	
)	
Defendants.)	

AFFIDAVIT AS TO REASONABLE ATTORNEY'S FEES


STATE OF _____
COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared Patrick Regan who being first duly sworn, does depose and state the following:

1. I am an attorney licensed to practice law in the District of Columbia and have been practicing before the Eastern District of Virginia since 1980. I am familiar with the fees that are customarily charged by attorneys, paralegals and legal assistants and allowed by the court, and know the reasonable value of such legal work.
2. I have known Thomas K. Plofchan, Jr., Esquire for approximately five years and have knowledge that Mr. Plofchan has been practicing law since 1992.
3. I have knowledge that Mr. Plofchan is an experienced litigator who has handled hundreds of jury trials and has handled previous civil rights matters.
4. I have been advised as to the amount of work performed, and have reviewed the pleadings in this matter, including the billing statements, the verdict, and the amended complaint.



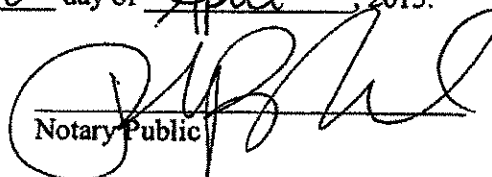
5. In reviewing these documents, I believe that this is a difficult and novel matter requiring significant time to prepare and properly litigate. I understand there was a complaint filed, an amended complaint, significant discovery was propounded, twelve depositions were conducted, a motion for summary judgment was heard and appealed, and the jury trial lasted six days (including deliberations). The time required would have precluded counsel from accepting other cases. Finally, the outcome of the case was extremely favorable to the client.
6. I further understand that civil rights cases are typically billed on a contingency basis, but I have had an opportunity to review Mr. Plofchan's fees charged in his hourly cases, which is consistently billed at \$500.00 per hour for at least the last several years.
7. In my opinion, I find his level of experience and expertise in litigation to be at least equal to his hourly rate charged, if not exceeding that. I believe the fees and costs referenced in the affidavits as well as his hourly rate are reasonable.
8. In my opinion, the sums listed in Mr. Plofchan's Affidavits of Attorney's Fees are reasonable fees in this case charged at a reasonable hourly rate of 500.00 for Mr. Plofchan, \$250-\$325 for associate attorneys, and \$60-160 for support staff.


Patrick Regan

STATE OF Washington, DC
COUNTY OF _____, to-wit;

Before me, the undersigned Notary Public, in and for the above-mentioned jurisdiction, appeared this day Patrick Regan, whose name is signed to the foregoing document, and acknowledged their signature thereto.

Subscribed and sworn to before me this 10th day of April, 2015.


Notary Public

My Commission Expires: 2/28/2019



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

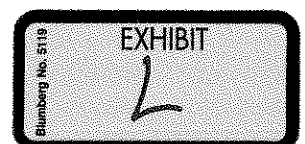
MARCUS MIAL,)	
)	
Plaintiff,)	
)	
v.)	1:11-cv-921
)	
JENNIFER A. SHERIN, <i>et al.</i> ,)	
)	
Defendants.)	

AFFIDAVIT AS TO REASONABLE ATTORNEY'S FEES

STATE OF _____
COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared Jason Collins who being first duly sworn, does depose and state the following:

1. I am an attorney licensed to practice law in the Commonwealth of Virginia, have been practicing since 2003, and have practiced before the Eastern District of Virginia. I am familiar with the fees that are customarily charged by attorneys, paralegals and legal assistants and allowed by the court, and know the reasonable value of such legal work.
2. I have known Thomas K. Plofchan, Jr., Esquire for approximately ten years and have knowledge that Mr. Plofchan has been practicing law since 1992.
3. I have knowledge that Mr. Plofchan is an experienced litigator who has handled hundreds of jury trials and has handled previous civil rights matters.



4. I have been advised as to the amount of work performed, and have reviewed the pleadings in this matter, including the billing statements, the verdict, and the amended complaint.
5. In reviewing these documents, I believe that this is a difficult and novel matter requiring significant time to prepare and properly litigate. I understand there was a complaint filed, an amended complaint, significant discovery was propounded, twelve depositions were conducted, a motion for summary judgment was heard and appealed, and the jury trial lasted six days (including deliberations). The time required would have precluded counsel from accepting other cases. Finally, the outcome of the case was extremely favorable to the client.
6. I further understand that civil rights cases are typically billed on a contingency basis, but I have had an opportunity to review Mr. Plofchan's fees charged in his hourly cases, which are consistently billed at \$500.00 per hour.
7. In my opinion, I find his level of experience and expertise in litigation to be at least equal to his hourly rate charged, if not exceeding that. I believe the fees and costs referenced in the affidavits as well as his hourly rate are reasonable.
8. In my opinion, the sums listed in Mr. Plofchan's Affidavits of Attorney's Fees are reasonable fees in this case charged at a reasonable hourly rate of 500.00 for Mr. Plofchan, \$250.00-\$325.00 for associate attorneys, and \$60.00-160.00 for support staff.



Jason Collins

STATE OF Virginia
COUNTY OF Landover, to-wit;

Before me, the undersigned Notary Public, in and for the above-mentioned jurisdiction, appeared this day Jason Collins, whose name is signed to the foregoing document, and acknowledged their signature thereto.

Subscribed and sworn to before me this 8th day of April, 2015.



Notary Public

My Commission Expires: 5-31-2017

